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Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Date: August 14, 2023

Case: Tehum 2004 Exams, In Re:

Planet Depos

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1 UNITED STATES BANKRUPTCY COURT

2 SOUTHERN DISTRICT OF TEXAS

3 HOUSTON DIVISION

4 - - - - - x

5 IN RE: :

6 TEHUM CARE SERVICES, INC. : Case No.

7 DEBTOR. : 23-90086 (CML)

8 : CHAPTER 11

9 - - - - - x

10
11 REMOTELY CONDUCTED VIDEOTAPED DEPOSITION OF

12 ISAAC LEFKOWITZ

13 AS CORPORATE DESIGNEE FOR GENEVA CONSULTING, LLC

14 MONDAY, AUGUST 14, 2023

15 8:36 A.M. CST

16
17
18 JOB NO.: 503115

19 PAGES: 1 - 128

20 REPORTED BY: KARISA EKENSEAIR, CCR RMR

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24
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1 DEPOSITION OF ISAAC LEFKOWITZ, CORPORATE
2 DESIGNEE, CONDUCTED VIA ZOOM VIDEOCONFERENCE.
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10 Pursuant to notice, before Karisa J.
11 Ekenseair, Certified Shorthand Reporter in and for
12 the States of Arkansas, Oklahoma, Missouri,
13 Tennessee, Georgia, Washington, and Illinois;
14 National Registered Professional Reporter,
15 National Registered Merit Reporter, Notary Public
16 in and for the State of Arkansas.
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21
22
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T A B L E O F C O N T E N T S

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Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

8

1 P R O C E E D I N G S

2 THE VIDEOGRAPHER: Here begins Media 08:36:09

3 Number 1 in the videotaped deposition of Tehum 08:36:11

4 2004 exams In Re: -- I'm sorry. 08:36:11

5 Here is Media Number 1 in the videotaped 08:36:11

6 deposition of Mr. Isaac Lefkowitz, designated 08:36:29

7 representative, in the matter of Tehum 2004 exams 08:36:32

8 In Re, in the United States Bankruptcy Court for 08:36:39

9 the Southern District of Houston, Texas Division, 08:36:43

10 Case Number 23-90086 (CML). 08:36:47

11 Today's date is August 14, 2023, and the 08:36:54

12 time on the video monitor is 8:36 a.m. 08:36:57

13 The videographer today the Lawrence 08:37:01

14 Wallace representing Planet Depos. This video 08:37:04

15 deposition is taking place remotely via Zoom. 08:37:07

16 Would counsel please voice-identify 08:37:11

17 themselves and state whom they represent beginning 08:37:13

18 with the taking attorney, please. 08:37:16

19 MR. HEMENWAY: Zach Hemenway from Stinson 08:37:17

20 LLP, representing the Committee. 08:37:21

21 MR. DAVIDSON: My name is Tad Davidson 08:37:25

22 from Hunton Andrews Kurth. I represent Geneva 08:37:26

23 Consulting, LLC. 08:37:26

24 MS. HAYWARD: Melissa Hayward from Hayward 08:37:36

25 PLLC, representing Perigrove 1018, LLC, and 08:37:37

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1	PharmaCorr, LLC.	08:37:41
2	MR. KAUFMAN: This is Aaron Kaufman with	08:37:44
3	the law firm of Gray Reed, representing the debtor	08:37:46
4	Tehum Care Services, Inc.	08:37:51
5	MR. HEMENWAY: And I also have in	08:37:53
6	attendance from Stinson, LLP Anna Turner and Nick	08:37:57
7	Zluticky.	08:38:03
8	THE VIDEOGRAPHER: If that's everyone, the	08:38:03
9	court reporter today is Karisa Ekenseair	08:38:05
10	representing Planet Depos.	08:38:08
11	Would the reporter please swear in the	08:38:09
12	witness.	08:38:11
13	ISAAC LEFKOWITZ	08:38:11
14	of lawful age, being first duly sworn, deposes and	08:38:11
15	says in reply to the questions propounded as	08:38:11
16	follows:	08:38:11
17	EXAMINATION	08:38:41
18	BY MR. HEMENWAY:	08:38:41
19	Q All right. Good morning, Mr. Lefkowitz	08:38:42
20	I'm Zach Hemenway, counsel for the Unsecured	08:38:45
21	Creditors Committee.	08:38:49
22	Now, you told us in one of your previous	08:38:50
23	deposition in this case you've had your deposition	08:38:53
24	taken around 100 times; is that right?	08:38:55
25	A Can we do some housekeeping first? Can	08:38:57

1	you give the -- Mr. Cross to identify himself as	08:39:00
2	well who is participating in the deposition?	08:39:04
3	MR. CROSS: I will not be questioning the	08:39:09
4	witness, but this is Ian Cross from Cross Law	08:39:11
5	PLLC, on behalf of Kohchise Jackson, William	08:39:15
6	Kelly, and Derico Thompson.	08:39:17
7	Q Mr. Lefkowitz?	08:39:25
8	A Yes.	08:39:26
9	Q Do you want me to repeat the question?	08:39:26
10	A Please.	08:39:29
11	Q You told us before you had your deposition	08:39:30
12	taken about 100 times; is that right?	08:39:32
13	A Correct.	08:39:35
14	Q So I'm going to assume you remember all	08:39:37
15	the basic things, like having your answers be	08:39:40
16	verbal rather than nodding your head and letting	08:39:42
17	me finish my question and letting the court	08:39:46
18	reporter answer any clarification she needs. And	08:39:49
19	I'll only go through them if we have an issue.	08:39:51
20	Does that sound good?	08:39:54
21	A Correct.	08:39:56
22	Q So you're here as the corporate	08:39:56
23	representative of Geneva Consulting, LLC; is that	08:39:58
24	right?	08:40:02
25	A Yes.	08:40:02

1	Q And do you understand what that means, to	08:40:02
2	be the corporate representative?	08:40:05
3	A Yes.	08:40:07
4	Q What is your understanding?	08:40:07
5	A Represent the corporation.	08:40:11
6	Q And what does that mean to you?	08:40:14
7	A To respond to the inquiry.	08:40:16
8	Q On behalf of the corporation?	08:40:24
9	A Correct.	08:40:26
10	Q And what's your understanding of the	08:40:26
11	corporation's knowledge in terms of the scope of	08:40:28
12	this deposition?	08:40:31
13	A Whatever documents is available.	08:40:36
14	MR. HEMENWAY: Let's go ahead and pull up	08:40:41
15	Exhibit 1, and it's the Rule 2004 notice.	08:40:43
16	(Exhibit 1 marked for identification.)	08:40:46
17	MR. HEMENWAY: As we're pulling that up,	08:40:50
18	I'm just going to state for the record our	08:40:52
19	agreement, Tad, that we've -- we agreed to a	08:40:54
20	limited scope of the 2004 notice in order to focus	08:40:58
21	on topics relevant to the mediation. And we've	08:41:01
22	agreed that moving forward on that scope doesn't	08:41:04
23	impact the Committee's right to conduct a future	08:41:07
24	2004 exam, nor Geneva's right to object to any	08:41:09
25	future topics.	08:41:17

1	MR. DAVIDSON: That's accurate.	08:41:18
2	Q Mr. Lefkowitz, have you reviewed this	08:41:20
3	document?	08:41:22
4	A Yes, I did.	08:41:23
5	Q And what did you do to prepare for the	08:41:23
6	deposition other than reviewing this document?	08:41:26
7	A Discussed it with counsel.	08:41:29
8	Q Did you talk with anybody else?	08:41:34
9	A Just internally to confirm the	08:41:36
10	documentation.	08:41:42
11	Q Who did you talk to internally?	08:41:43
12	A To the general counsel of Geneva.	08:41:45
13	Q Who is that?	08:41:49
14	A Zalman Schapiro.	08:41:51
15	Q And you said to confirm the documents.	08:41:54
16	Did you review documents in preparation of	08:41:57
17	this deposition?	08:42:02
18	A Yes.	08:42:03
19	Q What documents did you review?	08:42:03
20	A Documents that would -- were supplied	08:42:05
21	previously.	08:42:09
22	Q By whom?	08:42:09
23	A By Geneva.	08:42:10
24	Q You reviewed documents that were	08:42:12
25	previously supplied by Geneva.	08:42:18

1	When were they supplied?	08:42:20
2	A Eight that were supplied. I think my	08:42:22
3	counsel, Tad, would --	08:42:26
4	Q I'm sorry.	08:42:27
5	A I don't know --	08:42:29
6	MR. DAVIDSON: Part of the discovery,	08:42:29
7	Zach, Isaac doesn't know the date, but it was the	08:42:33
8	discovery that was produced.	08:42:34
9	MR. HEMENWAY: They were supplied to the	08:42:34
10	committee?	08:42:36
11	MR. DAVIDSON: Yes.	08:42:37
12	Q So you reviewed the documents that Geneva	08:42:40
13	produced to the Committee, Mr. Lefkowitz?	08:42:41
14	A Correct.	08:42:45
15	Q Did you review all of those documents or a	08:42:45
16	selection?	08:42:48
17	A All of them.	08:42:48
18	Q Do you recall how many there were?	08:42:50
19	A No.	08:42:57
20	Q Closer to 50 or a thousand?	08:42:57
21	A I can't quantify.	08:43:01
22	Q You're not capable of telling the	08:43:06
23	difference between 50 documents and a thousand	08:43:08
24	documents?	08:43:11
25	A I can tell the difference, but I can't	08:43:11

1	quantify.	08:43:14
2	Q So you don't remember how many documents	08:43:15
3	you looked at?	08:43:18
4	A I looked at all the documents.	08:43:21
5	Q Okay. When did you look at all the	08:43:23
6	documents?	08:43:26
7	A Prior to producing, during producing,	08:43:26
8	after production.	08:43:30
9	Q So some of those times were long before we	08:43:31
10	had noticed this deposition. I'm asking what you	08:43:38
11	did to prepare for this deposition after receiving	08:43:41
12	the 2004 notice?	08:43:44
13	A Discussed it with counsel.	08:43:45
14	Q Did you review any documents to prepare	08:43:49
15	for this deposition as opposed to reviewing them	08:43:51
16	for other purposes in the case?	08:43:55
17	A Yes.	08:43:57
18	Q Which documents did you review?	08:43:57
19	A Very same documents that was produced.	08:44:00
20	Q You reviewed all of Geneva's documents?	08:44:03
21	A Most of it.	08:44:06
22	Q How did you decide which ones to review	08:44:07
23	and which ones not to review?	08:44:12
24	A Just by scanning it through.	08:44:13
25	Q Okay. And you only talked to Zalman	08:44:16

1	Schapiro and you said counsel.	08:44:22
2	Are you talking about Mr. Davidson?	08:44:25
3	A And his co-counsel.	08:44:29
4	Q Mr. --	08:44:30
5	A I mean -- correct.	08:44:31
6	Q Did you talk to any other counsel other	08:44:33
7	than Mr. Schapiro, Mr. Davidson, and Mr. Guffy to	08:44:37
8	prepare for this deposition?	08:44:41
9	A No.	08:44:43
10	Q And did you review -- if we could scroll	08:44:43
11	down to the topics request, did you review these	08:44:48
12	examination topics on the last page of the 2004 of	08:44:56
13	this exhibit?	08:44:59
14	A I did.	08:45:00
15	Q And did you understand those topics?	08:45:00
16	A Yes.	08:45:03
17	Q Okay.	08:45:05
18	MR. HEMENWAY: So we can talk down the	08:45:09
19	deposition notice.	08:45:10
20	Q And let's go ahead and get started with	08:45:15
21	these topics.	08:45:17
22	So time period for the topics goes back to	08:45:19
23	December 1, 2021.	08:45:23
24	Who -- who was in charge of Geneva back	08:45:24
25	then?	08:45:26

1	A	What do you mean by in charge?	08:45:28
2	Q	Who made decisions at Geneva?	08:45:30
3	A	Which decisions?	08:45:35
4	Q	Any decision.	08:45:39
5	MR. DAVIDSON:	Objection, form. It's	08:45:43
6		outside the scope as well.	08:45:44
7	Q	Who made decisions --	08:45:52
8	A	I don't know --	08:45:52
9	Q	-- Mr. Lefkowitz?	08:45:52
10	A	You're going to have to tell me --	08:45:52
11	Q	-- the management structure -- who managed	08:45:55
12		the company?	08:45:58
13	MR. DAVIDSON:	Zach, as management	08:46:01
14		structure, decisions related to the debtors or the	08:46:02
15		merger parties or M2? So there's a limitation in	08:46:05
16		there which might help focus the deponent.	08:46:08
17	MR. HEMENWAY:	I'm looking at Topic 2,	08:46:11
18		Tad, that says your organizational and management	08:46:14
19		structure.	08:46:16
20	MR. DAVIDSON:	Okay.	08:46:17
21	Q	So who made decisions at Geneva,	08:46:18
22		Mr. Lefkowitz?	08:46:22
23	A	You're going to have to be more specific	08:46:22
24		in decisions.	08:46:24
25	Q	If it would depend on what the decision	08:46:25

1 was, you can tell me who made different decisions. 08:46:28

2 A I think we're going to have to do it 08:46:30

3 differently. You're going to have to ask me which 08:46:33

4 decision and I can tell you who was in charge. 08:46:36

5 Q Who made decisions on whether to enter 08:46:38

6 into contracts with Geneva? 08:46:40

7 A The general counsel. 08:46:41

8 Q Zalman Schapiro? 08:46:45

9 A Correct. 08:46:46

10 Q And Mr. Schapiro is a general counsel at 08:46:46

11 Perigrove as well, correct? 08:46:51

12 A That's correct. 08:46:52

13 MS. HAYWARD: Objection, form. 08:47:00

14 When you say Perigrove, you're going to 08:47:01

15 have to qualify what entity you're discussing. 08:47:04

16 Q What entity is Mr. Schapiro the general 08:47:06

17 counsel of, Mr. Lefkowitz? 08:47:08

18 A Perigrove, LLC. 08:47:10

19 Q Who is the general counsel at Perigrove 08:47:14

20 1018, LLC? 08:47:17

21 A There is no general counsel in Perigrove 08:47:18

22 1018. 08:47:22

23 Q So Mr. Schapiro made decisions on whether 08:47:23

24 to enter into contracts for Geneva? 08:47:28

25 A Yes. That's what you asked and that's 08:47:33

1	what I answered.	08:47:35
2	Q Who made financial decisions for Geneva?	08:47:36
3	A What does financial decisions mean?	08:47:38
4	Q Whether and where to send money.	08:47:40
5	A Depending on the transaction.	08:47:47
6	Q Okay. Who made them? If more than one	08:47:56
7	person made them depending on the transaction, you	08:48:00
8	can tell me who the people were.	08:48:02
9	A No. You can ask me which transaction, and	08:48:05
10	I can tell you who made the decision.	08:48:08
11	Q No. I'm asking who made financial	08:48:11
12	decisions.	08:48:14
13	A I'm answering you. Depending on the	08:48:14
14	transaction.	08:48:16
15	Q Do you know the answer, Mr. Lefkowitz?	08:48:16
16	A Know the answer?	08:48:19
17	Q Yeah. Do you?	08:48:21
18	A What question --	08:48:22
19	Q Do you know who made financial decisions	08:48:24
20	for Geneva?	08:48:26
21	A And I asked you which financial decision.	08:48:27
22	Q A financial decision to send an amount	08:48:31
23	over \$50,000?	08:48:35
24	A It depends on the client, and it depends	08:48:39
25	on the transaction.	08:48:41

1	Q	Okay. As to any of the companies involved	08:48:43
2		in the -- as to any of the companies listed in the	08:48:50
3		2004 notice, who made financial decisions?	08:48:55
4	A	You're going to have to identify which	08:48:58
5		company you're talking about.	08:49:00
6	Q	All right. As Corizon, meaning Corizon	08:49:05
7		Health, Inc. or any affiliated companies, who made	08:49:12
8		financial decisions?	08:49:15
9	A	I did.	08:49:16
10	Q	As to Valitas Health Services, Inc., to	08:49:16
11		the extent you weren't viewing that as part of	08:49:21
12		Corizon, who made financial decisions?	08:49:25
13	A	I do.	08:49:27
14	Q	As to YesCare Corp., who made financial	08:49:27
15		decisions?	08:49:31
16	A	I did.	08:49:31
17	Q	As to M2Loanco, who made financial	08:49:31
18		decisions?	08:49:36
19	A	I did.	08:49:36
20	Q	As to PharmaCorr, LLC and its parent	08:49:37
21		companies, who made financial decisions?	08:49:40
22	A	I did.	08:49:42
23	Q	As to Perigrove 1018, who made financial	08:49:43
24		decisions?	08:49:56
25	A	Not aware of any transactions with	08:49:57

1	Perigrove 1018.	08:49:59
2	Q As to Perigrove, LLC who made financial	08:50:01
3	decisions?	08:50:04
4	A I did.	08:50:05
5	Q Okay. Who were Geneva's officers -- oh,	08:50:05
6	and actually, let me scratch that. Let me start	08:50:18
7	over.	08:50:22
8	The questions I just asked were as of	08:50:22
9	November 1, 2021.	08:50:25
10	When you answered that you made financial	08:50:28
11	decisions, was that true through the date July	08:50:31
12	31st, 2023, to the extent financial decisions were	08:50:36
13	made?	08:50:40
14	A I don't think November '21 is the date.	08:50:40
15	Q You're right. It's February 1st, 2021.	08:50:45
16	A Neither.	08:50:52
17	Q Was there a time where anybody other than	08:50:53
18	you made financial decisions for any of those	08:50:59
19	entities that I listed as it relates to Geneva?	08:51:02
20	A What date?	08:51:05
21	Q Any date.	08:51:06
22	A You can't ask me any date. How would I	08:51:08
23	know any date?	08:51:15
24	Q You're here as the corporate	08:51:16
25	representative of Geneva. And you testified that	08:51:17

1 you made financial decisions for Geneva as to all 08:51:19
2 those entities I listed. 08:51:23

3 I'm asking: Did anybody other than you 08:51:25
4 ever make financial decisions as to those entities 08:51:27
5 for Geneva? 08:51:31

6 A You gave me a date frame. You gave me a 08:51:32
7 date frame of November 21st and I said it doesn't 08:51:34
8 exist. Then you gave me a date of February 21st 08:51:37
9 and I said it doesn't exist. 08:51:40

10 Q I -- 08:51:40

11 A So you walked away from those dates. And 08:51:43
12 where are you now, which time period? 08:51:45

13 Q Mr. Lefkowitz, I'm not sure what you mean 08:51:47
14 by a date doesn't exist. I'm asking as to 08:51:50
15 Geneva's -- 08:51:52

16 A I'm responding to your question? 08:51:52

17 Q Okay. 08:51:54

18 A Ask asked a question was Geneva in 08:51:56
19 November of 2021. Geneva, February 1, 2021, and I 08:51:57
20 said those dates don't exist. And then you went 08:52:03
21 away no dates at any time. 08:52:07

22 So what time frame are you talking about? 08:52:08

23 Q What do you mean when you say those dates 08:52:11
24 don't exist? 08:52:13

25 A I don't think Geneva was involved in those 08:52:14

1 dates when -- with these entities. 08:52:17

2 Q Okay. From the time period when Geneva 08:52:19

3 was involved with these entities through the 08:52:22

4 present, did anybody other than you make financial 08:52:25

5 decisions for Geneva? 08:52:28

6 A Not that I'm aware of. 08:52:30

7 Q You said you don't think Geneva was 08:52:32

8 involved with those entities as of those dates. 08:52:38

9 When did Geneva become involved with those 08:52:40

10 entities? 08:52:43

11 A December of 2021. 08:52:43

12 Q And how did Geneva get involved? 08:52:46

13 A They were retained by Perigrove. 08:52:52

14 Q Is Geneva affiliated with Perigrove? 08:52:55

15 A I don't know what the definition of 08:53:01

16 affiliation. 08:53:03

17 Q Does Perigrove have an ownership interest 08:53:04

18 in Geneva? 08:53:06

19 A I don't know. 08:53:08

20 Q You don't -- is -- what's the relationship 08:53:09

21 between Perigrove and Geneva? 08:53:16

22 A There's an MSA. 08:53:18

23 Q Okay. Who is the CEO of Perigrove? 08:53:22

24 A Where is the -- which Perigrove are you 08:53:32

25 talking about? 08:53:35

1	Q Perigrove, LLC, the Perigrove you just	08:53:37
2	said retained Geneva.	08:53:39
3	A Right. And where is this in the limited	08:53:40
4	scope of Geneva?	08:53:42
5	MS. HAYWARD: Objection, form, as to	08:53:44
6	scope -- questions about Perigrove, LLC. This	08:53:46
7	witness is here in his capacity as a corporate	08:53:50
8	capacity of Geneva.	08:53:53
9	MR. HEMENWAY: Yeah. And he's talking	08:53:54
10	about Geneva being retained by Perigrove. I'm	08:53:56
11	asking him if he knows that's how -- that's how	08:53:58
12	Geneva got involved with these entities. I'm	08:54:00
13	asking him if he knows who the CEO of Perigrove	08:54:03
14	is.	08:54:05
15	MS. HAYWARD: That's outside the scope.	08:54:06
16	Q So Perigrove is the counterparty to the	08:54:08
17	contract with -- to the contract with Geneva,	08:54:13
18	Mr. Lefkowitz; is that right?	08:54:15
19	A No. That's not right.	08:54:17
20	Q You just said that Perigrove retained	08:54:19
21	Geneva.	08:54:22
22	How did they retain Geneva?	08:54:22
23	A Just ask Geneva to do the services.	08:54:25
24	Q Who -- who asked Geneva?	08:54:28
25	A I don't recall who asked Geneva, but	08:54:33

1	Geneva was asked, and I was appointed as director.	08:54:39
2	Q Of Geneva?	08:54:41
3	A Correct.	08:54:42
4	Q And so you don't know who -- who made the	08:54:42
5	ask.	08:54:48
6	How did it occur?	08:54:48
7	A I don't recall. It was sometime in '21.	08:54:50
8	Q Was it by e-mail?	08:54:53
9	A I don't recall.	08:54:56
10	Q Okay. And you said that Perigrove made	08:54:58
11	this request?	08:55:00
12	A Correct. Perigrove.	08:55:03
13	Q Is that Perigrove -- go ahead.	08:55:03
14	A Perigrove 1018.	08:55:06
15	Q Okay. But you don't know who did it for	08:55:07
16	Perigrove?	08:55:12
17	A I want to say I don't know. I said I	08:55:13
18	don't recall.	08:55:17
19	Q Okay. And you were asked to -- you were	08:55:17
20	appointed as a director.	08:55:22
21	Who appointed you?	08:55:24
22	A I don't recall exactly the meeting. I	08:55:26
23	remember I took on the role and I went with it.	08:55:28
24	Q So you don't know who asked you or who	08:55:30
25	appointed you?	08:55:34

1	A I believe it was Zalman, but I don't	08:55:38
2	recall the meeting.	08:55:41
3	Q Okay. So Zalman -- when you say you	08:55:42
4	believe it was Zalman, Zalman appointed you a	08:55:47
5	director or Zalman asked you to -- or asked --	08:55:49
6	asked Geneva to do this work for Perigrove?	08:55:52
7	A Both.	08:55:57
8	Q Okay. So Zalman is the general counsel of	08:55:57
9	Perigrove, LLC.	08:56:02
10	Is he also the general counsel of Geneva?	08:56:05
11	I think you testified that; is that right?	08:56:08
12	A Yes, if you remember.	08:56:11
13	Q So when Zalman appointed you to do this	08:56:13
14	work for Perigrove, was he acting for Perigrove or	08:56:17
15	for Geneva?	08:56:22
16	A Both.	08:56:23
17	Q Okay. But you're saying you don't know if	08:56:23
18	Geneva is affiliated with Perigrove?	08:56:30
19	A I don't know what --	08:56:34
20	MS. HAYWARD: Objection, form.	08:56:34
21	THE WITNESS: I don't know what the word	08:56:36
22	affiliated means. You asked the question and I	08:56:37
23	said Geneva is an MSA to Perigrove 1018, so you	08:56:40
24	can interpret affiliation whichever way you wish.	08:56:47
25	Q I'm not -- I'm not interpreting. I'm	08:56:49

1 asking questions. 08:56:51

2 You're here on behalf of Geneva -- 08:56:52

3 A I don't -- 08:56:53

4 Q You're here on behalf -- 08:56:54

5 A I'm here on behalf of Geneva. And I've 08:56:55

6 been asked the question a few times and I answered 08:56:58

7 you, that Geneva was hired and Geneva was retained 08:57:01

8 to be an MSA for Perigrove 1018, and I was the 08:57:04

9 director in charge. 08:57:07

10 You're asking affiliated. I don't know 08:57:08

11 what the word affiliated means in this scope. 08:57:11

12 Q So affiliated, the definition we'll use is 08:57:13

13 that there's an ownership interest or a shared 08:57:18

14 ownership interest. 08:57:21

15 A You ask me that question, and I said I 08:57:23

16 don't know. 08:57:26

17 Q Do you know who owns Geneva? 08:57:26

18 A No. 08:57:29

19 Q Do you know who its members are? 08:57:29

20 A No. 08:57:32

21 Q Do you know who its officers are? 08:57:32

22 A No. 08:57:37

23 Q Do you know who its directors are? 08:57:37

24 A I am a director. 08:57:40

25 Q Do you know who any other directors are? 08:57:41

1 A You were given all the corporate documents 08:57:45
2 that governs the company, so -- 08:57:50
3 Q That's not an answer to the question, 08:57:51
4 Mr. Lefkowitz. 08:57:53
5 Do you know who the other directors are? 08:57:53
6 A I am a director and I do my duties. I 08:57:55
7 don't know who the officers are. I don't know who 08:57:58
8 the other directors are. And I don't know who the 08:58:01
9 owners are. 08:58:04
10 Q Do you know who the partners are? 08:58:05
11 A No. 08:58:07
12 Q Okay. 08:58:08
13 MR. HEMENWAY: Let's pull up -- all right. 08:58:15
14 Let's pull up an exhibit. We'll call it 08:58:23
15 Exhibit 2. It's 001586 is the document. 08:58:30
16 (Exhibit 2 marked for identification.) 08:58:34
17 REMOTE TECHNICIAN: Stand by. 08:58:37
18 BY MR. HEMENWAY: 08:58:51
19 Q Mr. Lefkowitz, have you ever seen this 08:58:51
20 document before? 08:58:58
21 A I can't view it. It's too tiny. 08:58:59
22 Q We can make it bigger. 08:59:04
23 Have you ever seen this document before? 08:59:06
24 A I see it now. Yes, I did. 08:59:07
25 Q You have seen it? 08:59:09

1	A Yes.	08:59:10
2	Q When did you see it?	08:59:11
3	A Before it was produced.	08:59:14
4	Q Okay. What is this document?	08:59:17
5	A The corporate filings in the State of	08:59:23
6	Delaware.	08:59:26
7	Q If we can scroll down or --	08:59:28
8	MR. HEMENWAY: If you can give me control,	08:59:31
9	Malcolm.	08:59:32
10	REMOTE TECHNICIAN: You should have	08:59:36
11	control now.	08:59:37
12	MR. HEMENWAY: Thank you.	08:59:38
13	BY MR. HEMENWAY:	08:59:43
14	Q So this document is signed by David	08:59:48
15	Gefner?	08:59:56
16	A Yes.	08:59:57
17	Q Do you know who David Gefner is?	08:59:57
18	A Yes.	09:00:01
19	Q Does David Gefner have a role at	09:00:01
20	Perigrove?	09:00:06
21	A Yes.	09:00:07
22	Q What is David Gefner's role at Perigrove?	09:00:07
23	MS. HAYWARD: Objection, form. Again,	09:00:15
24	when you say the word Perigrove you need to	09:00:16
25	qualify what Perigrove entity you're discussing.	09:00:19

1	Q What is David Gefner's role at Perigrove,	09:00:25
2	LLC?	09:00:29
3	A Not in the scope of discovery.	09:00:29
4	MS. HAYWARD: And object to the form for	09:00:32
5	discussions about Perigrove --	09:00:34
6	Q What is David Gefner's role at Perigrove,	09:00:36
7	LLC.	
8	A Not in the scope --	
9	MS. HAYWARD: Object to the form. Not in	
10	the scope --	
11	A -- of the --	
12	MS. HAYWARD: -- of a Geneva 2004 exam.	09:00:44
13	MR. HEMENWAY: Are you instructing him not	09:00:44
14	to answer the question, Melissa?	09:00:46
15	MS. HAYWARD: I'm objecting to the	09:00:46
16	question. It's outside the scope of a Geneva 2004	09:00:47
17	exam.	09:00:51
18	MR. HEMENWAY: Are you instructing him not	09:00:52
19	to answer the question?	09:00:53
20	MS. HAYWARD: Sure.	09:00:54
21	BY MR. HEMENWAY:	09:00:59
22	Q What is David Gerner's role at Geneva,	09:01:00
23	Mr. Lefkowitz?	09:01:03
24	A I don't interact with Mr. Gefner in	09:01:04
25	Geneva.	09:01:08

1 Q We're not asking about your interactions. 09:01:09
2 You're here as the corporate representative of 09:01:11
3 Geneva, and you were prepared to testify about the 09:01:13
4 officers directors, members, organizational and 09:01:19
5 management structure. 09:01:21
6 What's David Gefner's role at Geneva? 09:01:23
7 A I think you asked me the question if I 09:01:26
8 know who the officers are and I said no. You 09:01:28
9 asked me the question if I know who the directors 09:01:30
10 are. I said I don't know -- 09:01:33
11 Q Yeah. I know the questions I asked you. 09:01:34
12 A Don't -- don't override -- don't 09:01:36
13 overanswer me. 09:01:38
14 You asked me who the directors are, and I 09:01:39
15 said I don't know other than myself who the 09:01:41
16 directors are. Who asked me who the partners are, 09:01:43
17 and I said I don't know. You asked me who the 09:01:46
18 members of the LLC is, and I said I don't know. 09:01:48
19 So I think I've answered you all the 09:01:50
20 questions. You ask me if I interact with 09:01:53
21 Mr. Gefner in Geneva, and I said no. 09:01:57
22 Q I didn't ask you that. 09:01:57
23 I said what's Mr. Gefner's role at Geneva? 09:01:58
24 A I said I don't know his role in Geneva 09:02:00
25 because I don't interact with Mr. Gefner in 09:02:04

1	Geneva.	09:02:07
2	Q Are you saying he doesn't have a role or	09:02:08
3	you don't know what his role is?	09:02:10
4	A I don't know of any role.	09:02:11
5	Q Okay.	09:02:16
6	MR. DAVIDSON: Zach, this is where the	09:02:17
7	limitation does come in, right. If Mr. Gefner	09:02:19
8	doesn't have anything to do with the debtors, the	09:02:19
9	merger parties, or YesCare, then that's outside of	09:02:23
10	the scope of a Rule 2004 exam.	09:02:25
11	MR. HEMENWAY: All right. Let's pull up	09:02:26
12	Exhibit 2, please.	09:02:31
13	REMOTE TECHNICIAN: Sorry, counsel, I	09:02:31
14	believe exhibit --	09:02:33
15	MR. HEMENWAY: Sorry, Exhibit 3. Pull up	09:02:33
16	Exhibit 3.	09:02:37
17	REMOTE TECHNICIAN: All right. Do you	09:02:43
18	have a Bates number for that, Counsel?	09:02:44
19	MR. HEMENWAY: One second.	09:02:46
20	REMOTE TECHNICIAN: Okay.	09:02:47
21	MR. HEMENWAY: One second. The document	09:03:01
22	ending in 144502 -- excuse me, 532.	09:03:06
23	REMOTE TECHNICIAN: Stand by.	09:03:12
24	(Exhibit 3 marked for identification.)	09:03:17
25	By MR. HEMENWAY:	09:03:17

1	Q Okay. Have you seen this document before,	09:03:30
2	Mr. Lefkowitz?	09:03:32
3	MR. HEMENWAY: I'm not hearing anything.	09:03:49
4	Is anybody else hearing me?	09:03:51
5	REMOTE TECHNICIAN: It looks like the	09:03:55
6	witness is having trouble hearing. He's sort of	09:03:56
7	gesturing to his ear.	09:03:58
8	MR. HEMENWAY: Can you hear me?	09:04:00
9	REMOTE TECHNICIAN: I can hear you.	09:04:01
10	MR. HEMENWAY: Okay.	09:04:03
11	MS. HAYWARD: Isaac, I think your phone	09:04:04
12	may be on mute.	09:04:06
13	MR. KAUFMAN: I don't know if Isaac	09:04:37
14	experienced the same thing I did, but I just	09:04:40
15	experienced something where the audio went out and	09:04:42
16	I had to rejoin.	09:04:44
17	MR. HEMENWAY: Okay. Melissa, can we have	09:04:45
18	him rejoin?	09:04:47
19	MS. HAYWARD: Isaac, do you need to	09:04:50
20	rejoin?	09:04:53
21	MR. KAUFMAN: I'm guessing he can't hear.	09:04:56
22	REMOTE TECHNICIAN: Counsel, do you want	09:05:00
23	to go off record while we troubleshoot this or	09:05:02
24	stay on?	09:05:06
25	MR. HEMENWAY: Sure. We can go off the	09:05:06

1	record.	09:05:08
2	THE VIDEOGRAPHER: The time is 9:05 a.m.	09:05:08
3	We're off the record.	09:05:14
4	(Whereupon a break was had.)	09:05:15
5	THE VIDEOGRAPHER: The time is 9:08 a.m.	09:08:33
6	We're back on the record.	09:08:49
7	MR. HEMENWAY: And Malcolm, could you pull	09:08:50
8	Exhibit 3 back up?	09:08:56
9	BY MR. HEMENWAY:	09:09:01
10	Q All right.	09:09:02
11	A Not that I recall.	09:09:10
12	Q Okay. Do you see that it is a letter	09:09:11
13	dated March 22nd, 2022, and references --	09:09:24
14	A Correct.	09:09:24
15	Q -- RFP --	09:09:30
16	A Yes.	09:09:30
17	Q -- with the Arizona Department of	09:09:33
18	Corrections?	09:09:35
19	A Yes.	09:09:35
20	Q And that it's a Geneva Consulting, LLC	09:09:36
21	Letter of Commitment?	09:09:46
22	A Okay.	09:09:50
23	Q Who signed the Letter of Commitment for	09:09:50
24	Geneva Consulting?	09:09:54
25	A David Gefner, Sara Tirschwell.	09:09:56

1	Q And what is David Gefner's role at Geneva	09:10:00
2	Consulting listed as?	09:10:04
3	A CEO.	09:10:05
4	Q Does that refresh your memory as to	09:10:07
5	whether Mr. Gefner was an officer involved in the	09:10:10
6	business relationships with the debtor merger	09:10:13
7	parties or YesCare?	09:10:16
8	A No.	09:10:18
9	Q You said you didn't have any interactions	09:10:19
10	are Mr. Gefner as it relates to Geneva.	09:10:21
11	Are you testifying that you weren't	09:10:24
12	involved with this letter?	09:10:26
13	A Correct.	09:10:27
14	Q Okay. And you don't know why Mr. Gefner	09:10:28
15	signed this letter for Geneva?	09:10:40
16	A Correct.	09:10:41
17	MR. HEMENWAY: Let's get rid of Exhibit 3.	09:10:49
18	Q And let's go back to -- I think you said	09:10:55
19	December 1, 2021, was when Geneva's relationship	09:10:58
20	with Corizon began; is that right?	09:11:00
21	A Correct.	09:11:04
22	Q And how -- that relationship began by	09:11:05
23	Perigrove retaining Geneva?	09:11:10
24	MS. HAYWARD: Objection.	09:11:14
25	THE WITNESS: Perigrove 1018.	09:11:15

1	BY MR. HEMENWAY:	09:11:17
2	Q Perigrove 1018 retaining Geneva.	09:11:17
3	Why don't we -- why don't we do this	09:11:20
4	because I -- if I say Perigrove, I mean Perigrove	09:11:22
5	1018. And I'll say Perigrove, LLC if I mean	09:11:25
6	Perigrove, LLC.	09:11:25
7	A Why don't you do it different. Why don't	09:11:30
8	you say 1018.	09:11:32
9	Q Because then Melissa is going to have to	09:11:33
10	say a lot of objections when I forget to say 1018.	09:11:36
11	So this will go a lot faster if Perigrove just	09:11:37
12	means Perigrove 1018.	09:11:41
13	A Why don't you just -- whenever you say --	09:11:41
14	whenever you mean Perigrove 1018, call it 1018.	09:11:46
15	MR. HEMENWAY: Melissa, do you have any	09:11:49
16	objection to what I'm proposing?	09:11:50
17	THE WITNESS: I do.	09:11:52
18	MR. KAUFMAN: Whatever is easier for the	09:11:53
19	witness and for the record is fine.	09:11:55
20	MR. HEMENWAY: Okay. We can do it -- we	09:11:56
21	can do it the hard way. I'm trying to get us done	09:11:57
22	before dinnertime, but --	09:12:02
23	THE WITNESS: I think -- I think the easy	09:12:04
24	way if you call it 1018.	09:12:04
25	MR. HEMENWAY: I -- I appreciate the	09:12:07

1	input.	09:12:08
2	BY MR. HEMENWAY:	09:12:09
3	Q So you said that Perigrove 1018 retained	09:12:10
4	Geneva and that Zalman Schapiro made that decision	09:12:14
5	for Perigrove 1018?	09:12:21
6	A I didn't say that Zalman made that	09:12:25
7	decision. I said I was -- if anything, I was	09:12:28
8	requested by Zalman.	09:12:31
9	Q Okay. So Zalman Schapiro requested that	09:12:32
10	you serve as a director for Geneva?	09:12:36
11	A Correct.	09:12:40
12	Q Did Zalman Schapiro also request that	09:12:40
13	Geneva do work for Corizon?	09:12:46
14	A Yeah. For the entire organization.	09:12:51
15	Q What is the entire organization?	09:12:56
16	A 1018 organization.	09:12:59
17	Q What work did Zalman Schapiro request	09:13:06
18	Geneva do for the entire 1018 organization?	09:13:12
19	A MSA.	09:13:14
20	Q What does that mean?	09:13:16
21	A Managed services.	09:13:20
22	Q So Zalman Schapiro asked Geneva to do a	09:13:22
23	managed services agreement and didn't say what	09:13:27
24	services Perigrove 1018 wanted Geneva to perform?	09:13:30
25	A You -- you just asked a loaded question	09:13:36

Conducted on August 14, 2023

1	A	Correct.	09:15:01
2	Q	Okay. And was there a contract between	09:15:01
3		Perigrove 1018 and Geneva?	09:15:07
4	A	I don't believe so.	09:15:10
5	Q	Was there a contract between Geneva and	09:15:12
6		any of those companies?	09:15:16
7	A	I believe -- I believe some there were. I	09:15:27
8		don't know exactly, no, which one it was. But I	09:15:31
9		think some of them have MSA agreements.	09:15:34
10	Q	Okay. What did -- what did Geneva agree	09:15:37
11		to do under those contracts?	09:15:42
12	A	Manage services.	09:15:46
13	Q	Manage services. And how is the contract	09:15:47
14		between Geneva and whichever one of these	09:15:57
15		companies it sounds like you couldn't recall, how	09:16:01
16		was that negotiated?	09:16:04
17	A	I don't recall.	09:16:05
18	Q	Do you know what the terms were?	09:16:06
19	A	I mean, there's some fee that goes to	09:16:13
20		Geneva. I think -- I don't think there's anything	09:16:15
21		in particular but there's a fee that goes to	09:16:21
22		Geneva.	09:16:24
23	Q	Is that a monthly fee or annual fee?	09:16:24
24	A	I think there's a monthly minimum and then	09:16:30
25		there is a PM/PI fee.	09:16:32

1 Q What's a PM/PI fee? 09:16:38

2 A Per inmate per month. 09:16:41

3 Q What does that mean? 09:16:44

4 A What does per inmate per month mean? 09:16:47

5 Q Oh per inmate, excuse me. 09:16:51

6 How is that per inmate per month fee 09:16:57

7 calculated? Where does the inmate number come 09:17:01

8 from? 09:17:06

9 A ADP. 09:17:07

10 Q ADP meaning software that's used to track 09:17:10

11 the number of incarcerated individuals within 09:17:14

12 facilities? 09:17:19

13 A ADP mean average daily population. 09:17:22

14 Q Okay. And where does -- where do you 09:17:26

15 get -- I guess what I'm asking is the average 09:17:29

16 daily population of what facilities? 09:17:32

17 A All the facilities that's being managed. 09:17:34

18 Q Managed by Geneva? 09:17:43

19 A No. Managed by either the debtor or any 09:17:48

20 other. 09:17:54

21 Q The debtor or any other companies I named 09:17:57

22 when we went through that list? 09:18:00

23 A Correct. 09:18:03

24 Q And just to have a clean record here, 09:18:03

25 those entities were Valitas Health Services; 09:18:09

1 Corizon, LLC; Corizon Health of New Jersey; M2 09:18:15
2 Loanco; M2 Holdco; PharmaCorr; and YesCare; is 09:18:19
3 that correct? 09:18:28
4 A Correct. 09:18:28
5 Q Okay. So why was Geneva -- why was 09:18:29
6 Geneva's compensation based on the number of 09:18:37
7 incarcerated individuals? 09:18:39
8 A Why? 09:18:45
9 Q Yeah. 09:18:46
10 A I don't know what -- what does why mean? 09:18:48
11 Why what? What are you asking me exactly? 09:18:51
12 Q What's the relationship between the 09:18:54
13 services Geneva was performing and the number of 09:18:56
14 incarcerated individuals? 09:18:59
15 A It's how you quantify services. 09:19:03
16 Q So you're saying that if there are more 09:19:07
17 incarcerated individuals, there is more 09:19:11
18 credentialing and due diligence on transactions to 09:19:14
19 do? 09:19:19
20 A That's a -- yes. 09:19:19
21 Q Okay. 09:19:22
22 MR. HEMENWAY: Let's go ahead and pull up 09:19:24
23 Exhibit 4, which is the document ending in 01692. 09:19:26
24 REMOTE TECHNICIAN: Stand by. 09:19:34
25 (Exhibit 4 marked for identification.) 09:19:37

1	BY MR. HEMENWAY:	09:19:53
2	Q Is this the contract that you were	09:19:54
3	referring to Mr. Lefkowitz?	09:19:55
4	A One of them. Right.	09:20:01
5	Q Okay. So this is dated December 6th and	09:20:03
6	it's between Valitas Health Services and Geneva	09:20:11
7	Consulting.	09:20:15
8	A Okay.	09:20:18
9	Q Can you tell me how this contract was	09:20:18
10	negotiated?	09:20:24
11	A I don't recall.	09:20:25
12	Q Okay. And do you recall who was involved	09:20:27
13	in the negotiations?	09:20:31
14	A No.	09:20:33
15	Q Do you recall anything about this	09:20:33
16	contract?	09:20:37
17	A Yes.	09:20:38
18	Q What do you recall --	09:20:39
19	A It's from Geneva. It's when Geneva came	09:20:41
20	into play.	09:20:47
21	Could you scroll down to the last page of	09:20:49
22	this so I can recall the document?	09:20:52
23	Okay.	09:20:54
24	Q So this is signed by Geneva Consulting,	09:21:04
25	LLC, Jay Leitner as director?	09:21:09

1	A Okay.	09:21:13
2	Q What was Mr. Leitner's role at Geneva?	09:21:13
3	A I don't recall.	09:21:17
4	Q Is Mr. Leitner the chief operating officer	09:21:21
5	of Perigrove, LLC?	09:21:24
6	MS. HAYWARD: Objection, form. That's	09:21:28
7	outside the scope of this 2004 exam. Instruct the	09:21:30
8	witness not to answer any questions regarding	09:21:34
9	Perigrove, LLC.	09:21:37
10	MR. HEMENWAY: You're instructing him not	09:21:40
11	to answer before I ask the question?	09:21:42
12	MS. HAYWARD: You just asked him a	09:21:44
13	question.	09:21:46
14	MR. HEMENWAY: I understand that. I'm	09:21:47
15	saying you're instructing him not to answer future	09:21:48
16	questions?	09:21:51
17	MS. HAYWARD: I'm instructing him not to	09:21:51
18	answer this question regarding Perigrove, LLC.	09:21:53
19	MR. HEMENWAY: I heard that. I'm asking	09:21:55
20	you -- are you -- are you instructing him not to	09:21:57
21	answer future questions that I haven't asked yet?	09:21:59
22	MS. HAYWARD: I don't know what the future	09:22:02
23	questions are, so I'll reserve my objection to	09:22:04
24	that.	09:22:04
25	MR. HEMENWAY: Okay. I heard you say any	09:22:04

1 questions. So can you clarify? 09:22:07

2 MS. HAYWARD: At this point, I'm 09:22:08

3 instructing the witness not to answer the question 09:22:09

4 asked about management or ownership of Perigrove, 09:22:11

5 LLC. 09:22:16

6 MR. HEMENWAY: Okay. 09:22:18

7 BY MR. HEMENWAY: 09:22:21

8 Q Does Jay Leitner have a role at Perigrove 09:22:21

9 1018, LLC? 09:22:25

10 A Not that I know of. 09:22:26

11 Q And you signed this document as interim 09:22:27

12 CEO of Valitas Health Services; is that right? 09:22:35

13 A Correct. 09:22:39

14 Q And you were the CEO of Valitas Health 09:22:40

15 Services as of the date of this contract 09:22:44

16 December 6th, 2021? 09:22:48

17 A What it says. 09:22:51

18 Q I didn't ask what it says, Mr. Lefkowitz. 09:22:52

19 I'm asking if you were the CEO of Valitas 09:22:53

20 Health Services. 09:22:55

21 A My friend, first of all, you said 09:22:59

22 December 6th and it -- 09:23:01

23 Q I said the date of this -- I said the date 09:23:03

24 of this contract. If it's -- if it's -- if it 09:23:05

25 changes, then you can tell me you weren't as of 09:23:08

1 December 6th, and tell me that you were as of a 09:23:11
2 different date. 09:23:13

3 Were you the CEO of Valitas Health 09:23:14
4 Services as of December -- 09:23:16

5 A I don't -- I don't need your instruction 09:23:17
6 what to answer. I know the answer myself without 09:23:19
7 you instructing me. 09:23:22

8 Go back to the last page. It says 09:23:23
9 December 8th. 09:23:31

10 Q Yeah. I said the date of the contract, 09:23:32
11 meaning the date that says as of December 6th. If 09:23:35
12 you're drawing a distinction between that and 09:23:38
13 December 8th, we can talk about that. 09:23:41

14 Were you the CEO of Valitas Health 09:23:44
15 Services as of December 6th, 2021? 09:23:46

16 A So here it's a signature of December 8th. 09:23:50
17 On the day of December 8th, I signed as interim 09:23:56
18 CEO. That's correct. 09:23:59

19 Q Were you the CEO of Valitas Health 09:24:00
20 Services as of December 6th, 2021? 09:24:05

21 A This document shows that I was the interim 09:24:08
22 CEO on the December 8th, the day I signed the 09:24:16
23 document. 09:24:19

24 Q I'm not asking what the document shows. 09:24:19

25 Were you the CEO of Valitas Health 09:24:21

1	Services as of December 6th, 2021?	09:24:24
2	A I can only tell you based on the document	09:24:27
3	that on December 8th, I was the interim CEO of	09:24:31
4	Valitas.	09:24:36
5	Q I'm not asking based on the document.	09:24:37
6	When did you become interim CEO of Valitas	09:24:38
7	Health Services, Inc.?	09:24:44
8	A I don't recall.	09:24:45
9	Q Were you the CEO as of December 6th, 2021?	09:24:45
10	A I don't recall. I can only tell you	09:24:48
11	what's listed on the --	09:24:50
12	Q Were you -- sorry, go ahead.	09:24:52
13	A I can only tell that you on December 8th,	09:24:54
14	I signed the document as interim CEO. I don't	09:24:56
15	recall what happened on the 7th, and I don't	09:25:00
16	recall what happened on the 9th.	09:25:01
17	Q Were you the CEO of Valitas Health	09:25:02
18	Services on December 8th, 2021?	09:25:06
19	A Correct.	09:25:10
20	Q How did you become CEO?	09:25:10
21	A I don't recall.	09:25:13
22	Q What were Geneva's obligations under this	09:25:14
23	contract?	09:25:32
24	A As what it says.	09:25:34
25	Q So you don't know what Geneva did other	09:25:38

1	than this contract?	09:25:41
2	A It's corporate restructuring then and	09:25:45
3	managed services.	09:25:49
4	Q And what does that mean?	09:25:53
5	A What -- what does what mean? Managed	09:25:57
6	services? We went through that before.	09:25:59
7	Q Corporate restructuring?	09:26:02
8	A Yes. Valitas was on the brink of	09:26:04
9	bankruptcy and it needed corporate restructuring,	09:26:09
10	and Geneva was managing that portion of it.	09:26:12
11	Q And how did Geneva manage that? What did	09:26:15
12	it do?	09:26:18
13	A Worked the financial records, worked the	09:26:22
14	legal records, strategized meetings.	09:26:25
15	Q Who did that for Geneva?	09:26:29
16	A I did.	09:26:31
17	Q Anybody else?	09:26:33
18	A Myself. Myself and a team.	09:26:34
19	Q Who is your team?	09:26:38
20	A I reported to the general counsel and	09:26:43
21	there was outside services.	09:26:47
22	Q When you say you reported to general	09:26:49
23	counsel, the general counsel of Geneva or the	09:26:56
24	general counsel of Perigrove?	09:26:57
25	A Now you're talking about Geneva. I'm only	09:26:59

1 here to testify on behalf of Geneva. 09:27:02

2 Q Who did you report to? What was the 09:27:04

3 person's name? 09:27:07

4 A I think that question was asked a half a 09:27:09

5 dozen times, but I'll do it one more time. The 09:27:15

6 general counsel, his name is Zalman Schapiro. 09:27:17

7 MR. HEMENWAY: We can take down the 09:27:23

8 exhibit, Malcolm. 09:27:25

9 Q So your team was you, and you said you 09:27:29

10 reported to Zalman Schapiro. 09:27:33

11 Are you saying that he was part of the 09:27:35

12 Geneva team that performed these or that 09:27:36

13 you -- you reported to him as to the progress? 09:27:39

14 A Both. 09:27:42

15 Q And who else was part of your team? 09:27:43

16 A Outside services. 09:27:49

17 Q Who? 09:27:51

18 A Who means what? Who? 09:27:53

19 Q Outside -- what outside services? 09:27:57

20 Companies? People? 09:27:59

21 A Yeah. Companies, people, accountants, 09:28:01

22 lawyers, consultants. 09:28:04

23 Q What are their names, the names of the 09:28:05

24 companies? 09:28:07

25 A Outside of the limited scope that we 09:28:09

1 agreed on this deposition. 09:28:12

2 Q No, it's not. 09:28:13

3 A Yes, it is. 09:28:15

4 Q This is about your relationship with the 09:28:18

5 merger parties and the services you performed or 09:28:21

6 didn't perform for them. You just told me that 09:28:23

7 these -- these outside services performed under 09:28:26

8 this contract. 09:28:29

9 Who are they? 09:28:32

10 A Sir, I didn't say the outside, according 09:28:33

11 to the contract. I said Geneva used outside 09:28:37

12 services. 09:28:40

13 Q Okay. So Geneva used outside services and 09:28:42

14 it wasn't to do anything that Geneva was doing 09:28:45

15 under this contract I showed you? 09:28:48

16 A No. You keep -- you keep rephrasing the 09:28:51

17 question to create a record to trap, so why don't 09:28:55

18 I tell you exactly what this contract was. 09:28:59

19 This was a contract, Geneva Consulting on 09:29:02

20 behalf of Valitas, to create a managed services 09:29:06

21 agreement and corporate restructuring. I was the 09:29:09

22 director and I reported to the general counsel. 09:29:11

23 And Geneva used outside services, a team of 09:29:13

24 outside companies to help them perform those 09:29:18

25 tasks. 09:29:21

1 If this is not clear English for the 09:29:21
2 record, you ain't going to get another answer. 09:29:25
3 Q That -- that's a very helpful answer. 09:29:28
4 I'm asking who those outside companies 09:29:30
5 were. 09:29:32
6 A And I'm telling you: It's outside of the 09:29:33
7 scope of this discovery for me to identify law 09:29:35
8 firms and the accounting firms that helped and 09:29:39
9 worked for Geneva. 09:29:42
10 Q So what did these nameless outside 09:29:48
11 companies do? 09:29:53
12 A I didn't say they're nameless. I said 09:29:57
13 they have names. It's outside the scope -- 09:30:00
14 Q Well, if they have names, what are their 09:30:01
15 names? 09:30:06
16 A My friend, Zach, you've been -- I've been 09:30:06
17 through this you and Nick for the last six months. 09:30:08
18 Every time we give you a name, you create more 09:30:11
19 record, more legal fees, more discovery, more 09:30:14
20 depositions, more subpoenas. We agreed to a 09:30:18
21 limited discovery to tell you what Geneva did. We 09:30:22
22 provided you documents and now I'm providing you 09:30:27
23 the explanation to the documents. 09:30:30
24 Anything further you will not get in this 09:30:32
25 deposition. You would have to go and get your 09:30:35

1	remedy elsewhere.	09:30:39
2	Q Okay. I understand your answer to me,	09:30:40
3	you're not going to tell me the names because you	09:30:42
4	don't want us to get further discovery?	09:30:44
5	A That's not what I said.	09:30:47
6	MS. HAYWARD: Objection --	09:30:48
7	THE WITNESS: That's not what I said.	09:30:49
8	That's absolutely not what I said.	09:30:50
9	Q Okay?	09:30:52
10	A Again, you're putting -- you're creating	09:30:52
11	the record. You can do all the discovery you	09:30:54
12	wish. I'm not here to help in your investigation.	09:30:56
13	I'm here as a corporate representative of Geneva.	09:30:59
14	We provided you numerous, maybe thousands, of	09:31:03
15	documents. And I'm here to testify on behalf of	09:31:06
16	those documents and give you an explanation.	09:31:09
17	We agreed to a scope of discovery which is	09:31:12
18	a limited scope of discovery. You will not	09:31:16
19	deviate, go away from this limited scope of	09:31:20
20	discovery just, number one, for you to create a	09:31:22
21	record; number two, to create a new avenue of	09:31:25
22	investigation just to drain the legal fees from	09:31:29
23	the debtor. That, I will not allow.	09:31:33
24	You asked me a question. I will give you	09:31:36
25	an answer.	09:31:38

1 Q Are you done, Mr. Lefkowitz? 09:31:41

2 A Done with what? 09:31:43

3 Q What -- whatever that was. 09:31:45

4 A I don't know what the question is. 09:31:51

5 Q Okay. 09:31:53

6 A Is there a question pending and I'll 09:31:53

7 answer. 09:31:55

8 Q You're not going to tell us the names of 09:31:55

9 these entities. We've established that. 09:31:58

10 I'm asking what they did. 09:31:59

11 A They provided assistance in their 09:32:01

12 corporate work, whatever they do. 09:32:06

13 Q What assistance did they provide? 09:32:07

14 A Legal, financial, consulting, advice, 09:32:12

15 strategy. 09:32:19

16 Q How many entities were there? 09:32:20

17 A I will not respond to that question. 09:32:25

18 Q Any of these entities owned by Perigrove? 09:32:28

19 A I will not respond to the question. 09:32:32

20 Q And you negotiated this contract on behalf 09:32:34

21 of the Valitas? 09:32:46

22 A Correct. 09:32:47

23 Q And what was your role at Geneva when you 09:32:47

24 did that? 09:32:51

25 A May have been a director of Geneva then. 09:32:52

1	Q Okay. And you don't remember who	09:33:03
2	you -- you don't remember dealing with anybody at	09:33:05
3	Valitas on behalf of Geneva?	09:33:08
4	A I don't remember dealing with Valitas on	09:33:16
5	behalf of Geneva.	09:33:18
6	Q I asked you if you remember anything about	09:33:20
7	the negotiation of this contract. I thought you	09:33:21
8	said --	09:33:23
9	A That I -- that I don't recall the details	09:33:24
10	of it. The contract speaks for itself.	09:33:26
11	Q So when -- you mentioned that the	09:33:29
12	corporate restructuring was because the company	09:33:35
13	was on the verge of -- well, I don't want to put	09:33:37
14	words in your mouth.	09:33:42
15	You mentioned something about the	09:33:43
16	company's financials when we were talking about	09:33:45
17	the contract.	09:33:46
18	What was the financial situation for	09:33:47
19	Valitas or Corizon at the time of this contract?	09:33:50
20	A It was insolvent. It was on the doorsteps	09:33:56
21	of the bank court -- courthouse of the bankruptcy.	09:34:00
22	Q Okay. And the contract called for	09:34:09
23	\$500,000 a month to Geneva; is that right?	09:34:13
24	A Correct.	09:34:16
25	Q And -- in return for 500,000, I believe	09:34:17

1 you testified Corizon is getting managed services 09:34:24
2 and corporate restructuring? 09:34:27
3 A Correct. 09:34:30
4 Q And were any of those services performed 09:34:30
5 by Geneva employees? 09:34:36
6 A Which services? 09:34:45
7 Q The services under the contract. 09:34:46
8 A Was done by Geneva. 09:34:54
9 Q Were they performed by Geneva employees? 09:34:55
10 A I don't know what you mean by performed by 09:34:59
11 employees. 09:35:02
12 Q Does Geneva have employees? 09:35:02
13 A The company produced whatever it needed to 09:35:04
14 produce their services. Whether it was done by 09:35:07
15 employees or whether it was done by directors or 09:35:12
16 whether it was done by outside consultants, 09:35:15
17 lawyers, accountants, and advisors, it did the 09:35:20
18 work, whatever it took to do. 09:35:24
19 Q Yeah. I understand that, Mr. Lefkowitz. 09:35:25
20 And -- 09:35:28
21 A If you understand the question, why are 09:35:29
22 you asking me again three times the same question? 09:35:31
23 Q Because you haven't answered it. 09:35:33
24 A I did. 09:35:35
25 Q Does Geneva have employees? 09:35:36

1	A I believe so.	09:35:40
2	Q Who are Geneva's employees?	09:35:42
3	A I don't have the record in front of me,	09:35:45
4	who the employees are.	09:35:47
5	Q Does Geneva have a payroll?	09:35:48
6	A I believe so.	09:35:52
7	Q Does it have employment contracts?	09:35:53
8	A I don't know.	09:35:58
9	Q Does it maintain any time records showing	09:36:00
10	what Geneva employees do?	09:36:02
11	A I don't know.	09:36:05
12	Q How many employees does Geneva have?	09:36:05
13	A I don't know.	09:36:11
14	Q Is it less than five?	09:36:12
15	A I don't know. I know my part. I	09:36:16
16	don't -- I'm not in human resource.	09:36:19
17	Q Okay. So in terms of your part, how many	09:36:21
18	employees are you aware of?	09:36:24
19	A I interact with a few employees.	09:36:28
20	Q Who?	09:36:31
21	A I told you who I report to.	09:36:34
22	Q Zalman Schapiro?	09:36:37
23	A Correct.	09:36:39
24	Q Is Zalman Schapiro an employee of Geneva?	09:36:40
25	A I don't know.	09:36:46

1	Q	You said you interact with a few	09:36:47
2		employees?	09:36:52
3	A	Correct.	09:36:54
4	Q	And you said Zalman Schapiro?	09:36:54
5	A	Zalman Schapiro and his team.	09:36:59
6	Q	And is Zalman Schapiro an employee of	09:37:02
7		Geneva?	09:37:04
8	A	I don't know.	09:37:05
9	Q	Who are employees that you said you	09:37:06
10		interact with?	09:37:09
11	A	Zalman Schapiro and his team.	09:37:09
12	Q	Who is his team?	09:37:14
13	A	Zalman has a team.	09:37:17
14	Q	Who is on it?	09:37:19
15	A	Zalman and his team.	09:37:22
16	Q	Are Zalman Schapiro and his team -- is	09:37:26
17		anybody from Zalman Schapiro's team employees	09:37:30
18		of --	09:37:34
19	A	I don't know. I'm not in HR so I don't	09:37:34
20		know who is an employee and who is not.	09:37:36
21	Q	So when you said you believed Geneva has	09:37:38
22		employees, what was that based on?	09:37:41
23	A	Belief.	09:37:45
24	Q	What was your belief based on?	09:37:48
25	A	Beliefs.	09:37:51

1	Q What is your personal experience with	09:37:57
2	Geneva having employees? Have you ever seen a	09:38:00
3	payroll?	09:38:03
4	A No.	09:38:04
5	Q What basis do you have for thinking Geneva	09:38:04
6	has employees other than belief?	09:38:09
7	A Interact with them on a daily basis.	09:38:13
8	Q When you say you interact with them on a	09:38:17
9	daily basis, is that talking about Zalman Schapiro	09:38:20
10	and his team?	09:38:22
11	A Correct.	09:38:23
12	Q And you told us that you don't know	09:38:24
13	whether they're employees, so why would that be a	09:38:25
14	basis --	09:38:28
15	A I don't have --	09:38:29
16	Q Go ahead.	09:38:30
17	A I don't have direct knowledge who is an	09:38:32
18	employee, who is an independent contractor, who is	09:38:35
19	a W2, who is a 1099. I'm too busy all day long to	09:38:37
20	do and get involved in stuff that I'm not	09:38:43
21	a -- that I don't need to know. You're asking me	09:38:47
22	if I know who is an employee. The answer is I	09:38:51
23	don't know.	09:38:54
24	Q Okay.	09:38:54
25	A You're asking me --	09:38:54

1	Q Who performs services for Corizon?	09:38:56
2	A Corizon.	09:39:02
3	Q For -- who at Geneva performs services for	09:39:06
4	PharmaCorr, Corizon, any of the Corizon entities,	09:39:12
5	YesCare, Tehum, any of the entities that we	09:39:17
6	listed?	09:39:21
7	A Geneva.	09:39:21
8	Q Who at Geneva?	09:39:22
9	A I told you who at Geneva. I'm the	09:39:27
10	director. I interact with Zalman and team.	09:39:30
11	Q Any other directors perform services for	09:39:35
12	those entities?	09:39:43
13	A You asked the question and I told you I'm	09:39:44
14	not aware of.	09:39:47
15	Q Okay. And you don't know the names of	09:39:48
16	Zalman Schapiro's team?	09:39:58
17	A I didn't say I don't know the names.	09:39:58
18	Q Okay. What are their names?	09:40:01
19	A I didn't say that. I -- I said that I	09:40:03
20	report to Zalman and team. I didn't say that I	09:40:06
21	don't know their names.	09:40:11
22	Q Okay.	09:40:12
23	A You're putting words into my mouth and	09:40:12
24	you're creating a record of avoidance.	09:40:17
25	Q No. I apologize, I -- I would like to	09:40:21

1	know their names. I'm not trying to create a	09:40:24
2	record that you don't know their names.	09:40:27
3	What are their names?	09:40:29
4	A I said I work with Zalman and team. I	09:40:31
5	report to Zalman. These are the group that does	09:40:33
6	the services on behalf of Geneva.	09:40:39
7	Q Who is team?	09:40:41
8	A The question has been asked and answered.	09:40:44
9	Q No, it hasn't.	09:40:47
10	A Yes, it has.	09:40:49
11	Q Who is the team?	09:40:51
12	A It has been asked and answered.	09:40:51
13	Q Okay. Let's try it a different way.	09:40:53
14	You said you interact with them daily.	09:40:55
15	Who do you interact with daily other than Zalman	09:40:58
16	Schapiro as to Geneva?	09:41:01
17	A Zalman and team.	09:41:02
18	Q And you're not going to tell us who the	09:41:03
19	team is?	09:41:05
20	A Exactly.	09:41:05
21	Q How many people are on the team?	09:41:06
22	A The question has been asked and answered.	09:41:09
23	Q Does the team exist?	09:41:12
24	A Yes.	09:41:14
25	Q And you're not going to tell us how many	09:41:16

1 people are on it or any of their names? 09:41:18

2 A Exactly. 09:41:20

3 Q What services does the team perform? 09:41:21

4 A Managed services. 09:41:25

5 Q And that is credentials and due diligence 09:41:27

6 on transactions? 09:41:33

7 A Correct. Asked and answered before. 09:41:33

8 Q Are the team Geneva employees? 09:41:44

9 A The question has been asked and answered. 09:41:46

10 Q Could you answer it again for me? 09:41:48

11 A No. You can -- go back to the record. 09:41:50

12 Ask your reporter to read back the record. 09:41:54

13 Q Who other than you engaged these outside 09:42:03

14 services companies for Geneva? 09:42:18

15 A I don't know. Other than me? 09:42:25

16 Q Yeah. 09:42:31

17 A I don't know. 09:42:33

18 Q Did you make decisions on who to engage on 09:42:37

19 behalf of Geneva? 09:42:41

20 A No. 09:42:43

21 Q Wouldn't those be financial decisions, 09:42:44

22 Mr. Lefkowitz? 09:42:48

23 A Financial decisions? How is it a 09:42:49

24 financial decision? 09:42:54

25 Q You didn't pay these companies? 09:42:55

1	A I didn't say I didn't pay.	09:42:58
2	Q So engaging somebody to do services and	09:43:01
3	agreeing to pay them for the services would be a	09:43:07
4	financial decision, would it not?	09:43:10
5	A Not necessarily.	09:43:11
6	Q Okay. Were you involved in the decisions	09:43:12
7	to engage any outside services on behalf of	09:43:17
8	Geneva?	09:43:20
9	A No.	09:43:21
10	Q Was anybody else at Geneva involved in	09:43:21
11	those decisions?	09:43:28
12	A I don't know.	09:43:29
13	Q Okay.	09:43:29
14	MR. HEMENWAY: Let's take a break. We've	09:43:30
15	been -- with the break, we've been going about an	09:43:32
16	hour.	09:43:35
17	MS. HAYWARD: How long of a break, Zach?	09:43:38
18	MR. HEMENWAY: Let's -- we can just start	09:43:40
19	back up at 9:55 unless people want to wait until	09:43:43
20	10:00.	09:43:51
21	THE VIDEOGRAPHER: The time is 9:43 a.m.	09:43:51
22	We're going off the record.	09:43:54
23	(Whereupon a break was had.)	09:43:55
24	THE VIDEOGRAPHER: The time is 9:55 a.m.	09:55:54
25	We're back on the record.	09:55:59

Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

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1	BY MR. HEMENWAY:	09:56:00
2	Q Mr. Lefkowitz, we were talking about the	09:56:07
3	monthly fees received by Geneva from Corizon under	09:56:11
4	the contract.	09:56:17
5	That was 500,000 a month, correct?	09:56:19
6	A Yes.	09:56:23
7	Q And we talked -- you've already covered	09:56:24
8	what services that was for.	09:56:27
9	How -- how were those payments made?	09:56:29
10	A Typically by wire.	09:56:34
11	Q By wire. And were there -- were there	09:56:41
12	invoice -- invoices received describing services	09:56:52
13	or did --	09:56:55
14	Let me rephrase that, I apologize.	09:56:55
15	Did Geneva send invoices describing the	09:56:57
16	services that were performed?	09:57:01
17	A I believe so.	09:57:02
18	Q And what types of descriptions did the	09:57:03
19	company include in those invoices?	09:57:05
20	A I don't have the invoices in front of me.	09:57:09
21	Q Do you remember if Geneva described	09:57:12
22	anything that it did in the invoices?	09:57:16
23	A No.	09:57:18
24	Q Okay. And what was the term -- what was	09:57:19
25	the time period where Geneva provided these	09:57:28

1 services to Corizon? 09:57:37

2 A To Corizon or to Valitas? 09:57:37

3 Q To Valitas under this agreement. 09:57:43

4 A What was the terms? 09:57:46

5 Q The time period. 09:57:48

6 So when was this agreement in effect? 09:57:51

7 A Oh, I think for a few months in 2022. 09:57:54

8 Q Do you remember when it ended? 09:58:07

9 A No. 09:58:20

10 Q Do you know why it ended? 09:58:20

11 A I think it ended when Valitas and after 09:58:22

12 the merger, it continued on with YesCare. 09:58:30

13 Q Was it the same agreement with YesCare or 09:58:37

14 did YesCare and Geneva enter into a new agreement? 09:58:39

15 A They entered into a new agreement. 09:58:44

16 Q Okay. So then I'll represent to you the 09:58:46

17 divisional merger was in May 1, 2022, and 09:58:51

18 it -- the agreement went from December 1, 2021, 09:58:57

19 that we just saw, through May 2022. 09:59:02

20 Is that what you're saying? 09:59:06

21 A I don't know if it went all the way to 09:59:06

22 May 1, 2022. 09:59:10

23 Q Okay. So April then? April or May, is 09:59:11

24 that the clarification you're making? 09:59:15

25 A I don't have the exact number. 09:59:17

1	Q	Okay. Was Geneva performing services for	09:59:19
2		Valitas in January 2022?	09:59:23
3	A	I believe so.	09:59:29
4	Q	How about February 2022?	09:59:30
5	A	I believe so.	09:59:32
6	Q	March 2022?	09:59:33
7	A	I believe so.	09:59:35
8	Q	Okay. So in some of that time, Geneva	09:59:37
9		was -- was Geneva performing services for YesCare?	09:59:45
10	A	YesCare didn't exist then.	09:59:51
11	Q	Was Geneva working on RFPs seeking	09:59:53
12		contracts for YesCare?	10:00:01
13	A	Geneva seeking RFPs, you're saying?	10:00:07
14	Q	Was Geneva assisting with any RFPs that	10:00:10
15		were seeking contracts for YesCare?	10:00:17
16	A	The only thing that I know was the	10:00:20
17		document you pulled up -- pulled up before.	10:00:22
18	Q	What document?	10:00:25
19	A	You showed an exhibit before. Something	10:00:32
20		with Geneva in Arizona.	10:00:34
21	Q	And what -- what do you recall about	10:00:38
22		Geneva assisting with the Arizona RFP?	10:00:43
23	A	I don't recall. I wasn't involved in	10:00:46
24		that.	10:00:48
25	Q	You weren't involved in the Arizona RFP?	10:00:48

1	A	Involved in the Arizona RFP? I was not	10:00:51
2		involved in that document.	10:00:55
3	Q	When you say you weren't involved, you	10:00:56
4		mean you didn't help draft it?	10:01:04
5	A	You can look up the definition of	10:01:08
6		involved. I was not involved in that document.	10:01:11
7	Q	Okay.	10:01:13
8	MR. HEMENWAY:	Let's pull up -- we're	10:01:18
9		going to pull up another exhibit. I've got to get	10:01:21
10		the name of it. Sorry, give us one second.	10:01:24
11		Let's pull up the document with Bates	10:01:46
12		label 113011.	10:01:52
13	REMOTE TECHNICIAN:	Stand by.	10:01:57
14		(Exhibit 5 marked for identification.)	10:01:58
15	MR. HEMENWAY:	What exhibit number	10:02:00
16		is -- are we at, Malcolm?	10:02:02
17	REMOTE TECHNICIAN:	Five.	10:02:04
18	MR. HEMENWAY:	Thank you.	10:02:05
19	BY MR. HEMENWAY:		10:02:17
20	Q	Mr. Lefkowitz, take as much time as you	10:02:18
21		need to -- to review this document and let me know	10:02:20
22		when you're ready.	10:02:22
23	A	I'm ready.	10:02:23
24	Q	So this document's dated February 22nd,	10:02:25
25		2021. And it says YesCare, Corp. Is managed and	10:02:33

1	financially supported by Geneva Consulting, LLC.	10:02:36
2	A Hello?	10:02:47
3	Q Is that a true statement?	10:02:47
4	A I don't know. I didn't sign this RFP.	10:02:50
5	Q I'm asking you if YesCare, Corp. was	10:02:56
6	managed and financially supported by Geneva	10:02:59
7	Consulting, LLC.	10:03:01
8	A I did not write this RFP. I don't know	10:03:04
9	what they're referring to.	10:03:10
10	Q Okay. It also says Geneva Consulting, LLC	10:03:11
11	is a subsidiary of Genesis Healthcare?	10:03:17
12	A I see what it says.	10:03:22
13	Q Is Geneva Consulting, LLC a subsidiary of	10:03:24
14	Genesis Healthcare?	10:03:27
15	A I don't know.	10:03:28
16	Q You don't know?	10:03:30
17	A Correct.	10:03:31
18	Q Was Geneva Consulting, LLC ever a	10:03:32
19	subsidiary of Genesis Healthcare?	10:03:36
20	A I don't know.	10:03:38
21	Q Okay.	10:03:38
22	MR. HEMENWAY: Let's go ahead and pull up	10:03:49
23	Bates number 138299.	10:03:50
24	REMOTE TECHNICIAN: Stand by.	10:03:56
25	(Exhibit 6 marked for identification.)	10:04:02

1	BY MR. HEMENWAY:	10:04:07
2	Q So Mr. Lefkowitz, when we showed you the	10:04:08
3	last document, you said you didn't know where that	10:04:10
4	language came from.	10:04:13
5	A Correct.	10:04:14
6	Q On Exhibit 5 -- we'll go back to Exhibit 5	10:04:15
7	just for a minute.	10:04:19
8	And Exhibit 5, Ms. Rawnsley said, This was	10:04:20
9	provided by Isaac for the Arizona bid.	10:04:28
10	Do you see that?	10:04:31
11	A Yeah.	10:04:31
12	Q Do you think she's talking about a	10:04:32
13	different Isaac?	10:04:35
14	A I don't know.	10:04:37
15	Q Okay. Let's go to Exhibit 6. I'll show	10:04:37
16	you the whole e-mail. I don't want to just ask	10:04:47
17	you about that.	10:04:50
18	The first e-mail is you to three others at	10:04:52
19	Corizon. And you say, CHS AZ DOC, YesCare, but	10:04:56
20	then it says, managed by Geneva Consulting, a	10:05:03
21	wholly owned subsidiary of Genesis Healthcare, a	10:05:06
22	publically traded company.	10:05:12
23	A Yes, I see that.	10:05:12
24	Q This is dated February 11th.	10:05:13
25	A Okay.	10:05:16

1	Q	So was YesCare managed by Geneva	10:05:17
2		Consulting on February 11th?	10:05:21
3	A	I don't believe so.	10:05:26
4	Q	Was it ever managed by Geneva Consulting?	10:05:26
5	A	Yes.	10:05:30
6	Q	When?	10:05:30
7	A	There's a management service agreement.	10:05:32
8	Q	Okay. And it says Geneva Consulting is a	10:05:36
9		wholly owned subsidiary of Genesis Healthcare on	10:05:43
10		February 11, 2022?	10:05:53
11	A	I don't know.	10:05:53
12	Q	You don't know?	10:05:53
13	A	No.	10:05:55
14	Q	Okay. And --	10:05:56
15	A	This e-mail is not a statement from me. I	10:06:03
16		don't know what this e-mail was.	10:06:06
17	Q	It's not a --	10:06:08
18	A	It could be a question --	10:06:08
19	Q	-- statement from you? What would the --	10:06:08
20	A	It could be a question. It could be a	10:06:11
21		statement. It could be anything. It doesn't say	10:06:13
22		in reference to anything.	10:06:16
23	Q	Sure. I'm -- I mean, this is -- you're	10:06:17
24		not saying this is not an e-mail you sent?	10:06:20
25		You're -- you're questioning the context; is that	10:06:23

1	right?	10:06:27
2	A I -- I question in what reference this	10:06:27
3	context is.	10:06:31
4	Q Understood.	10:06:31
5	A It does not -- it does not say here, I,	10:06:32
6	Isaac Lefkowitz, instruct that this is the	10:06:34
7	language should be written in such-and-such.	10:06:37
8	Basically, it's copy/paste of language, so I have	10:06:42
9	no idea in what reference this is about.	10:06:45
10	Q It's copy/paste? Where did you copy/paste	10:06:48
11	it from, Mr. Lefkowitz?	10:06:52
12	A I didn't say that I copy/paste. I say	10:06:53
13	what this e-mail does not give any reference to	10:06:55
14	what the content of the e-mail is referring to.	10:06:58
15	Q Yeah? I understood that and then you said	10:07:01
16	it was copy/paste. And so I was just trying to	10:07:03
17	understand what you meant by that.	10:07:06
18	A Strike that. That was just slang.	10:07:08
19	Q That was just what?	10:07:11
20	A Slang.	10:07:14
21	Q I'm still not understanding you --	10:07:16
22	A Okay. Okay. Then forget about the	10:07:19
23	answer. I don't know what this e-mail refers to.	10:07:21
24	Q Sure. I just -- and if the court reporter	10:07:24
25	got it, that's fine. I couldn't understand the	10:07:27

1 word you said. 10:07:32

2 A Okay. 10:07:32

3 Q You said that was just, and then you said 10:07:33

4 a word. 10:07:35

5 A Ask the question again and you'll get the 10:07:36

6 answer. 10:07:40

7 Q My question is: What word did you say 10:07:41

8 when you were describing why you said copy/paste? 10:07:43

9 A Read back the record. 10:07:48

10 Q I mean, I guess -- I guess you can look at 10:07:54

11 your errata and correct it if the court reporter 10:07:56

12 got it wrong. 10:07:59

13 A Okay. 10:08:00

14 Q Okay. And I understand that there's no 10:08:01

15 context on this. I'm just asking you if the 10:08:05

16 statements here are accurate. 10:08:09

17 So you said that YesCare was not managed 10:08:12

18 by Geneva Consulting as of February 11th, 2021 but 10:08:16

19 was at a later date, correct? 10:08:21

20 A I didn't say that. 10:08:23

21 Q Okay. Was -- was -- let me -- I -- I know 10:08:24

22 you don't like when questions are re-asked, but I 10:08:30

23 thought that's that what I heard. I want to 10:08:33

24 clarify and make the record clear and make sure I 10:08:35

25 understand what you're saying, Mr. Lefkowitz. 10:08:39

1 So was YesCare managed by Geneva 10:08:41

2 Consulting as of February 11th, 2021? 10:08:45

3 A I said I don't know because I don't know 10:08:48

4 the date of the agreement between -- the MSA 10:08:50

5 agreement -- and Geneva. 10:08:53

6 Q And was Geneva Consulting a subsidiary of 10:09:00

7 Genesis Healthcare as of February 2022? 10:09:04

8 A I said I don't know. 10:09:07

9 Q What's the relationship between Geneva 10:09:09

10 Consulting and Genesis Healthcare? 10:09:12

11 A I don't know. 10:09:15

12 Q Is there a relationship? 10:09:16

13 A I don't know. 10:09:26

14 Q Let's pull up -- actually scratch that. 10:09:29

15 Yeah. Let's go to the -- 10:10:00

16 You mentioned that there was an agreement 10:10:02

17 between Geneva and YesCare following the 10:10:04

18 divisional merger; is that correct? 10:10:09

19 A I don't know if it's following or during 10:10:13

20 or prior. There is an agreement between Geneva 10:10:15

21 and YesCare. 10:10:17

22 Q Okay. And do you recall the terms of that 10:10:18

23 agreement, Mr. Lefkowitz? 10:10:27

24 A No. 10:10:29

25 Q How was that agreement negotiated? 10:10:29

1	A	Between YesCare and Geneva.	10:10:42
2	Q	So those are the parties.	10:10:44
3		Who negotiated it?	10:10:46
4	A	I don't recall.	10:10:50
5	Q	Were you in charge of that contract for	10:10:55
6		Geneva?	10:10:59
7	A	I think Zalman was.	10:11:03
8	Q	Do you know who Geneva interacted with at	10:11:07
9		YesCare to reach that agreement?	10:11:13
10	A	YesCare folks.	10:11:16
11	Q	Who are the YesCare folks?	10:11:18
12	A	At that time?	10:11:21
13	Q	The YesCare folks that Geneva would have	10:11:24
14		interacted with -- excuse me, that Geneva did	10:11:27
15		interact with.	10:11:32
16	A	At what period?	10:11:33
17	Q	In -- in reaching the agreement.	10:11:34
18	A	YesCare has a CEO, a CFO, a chief counsel.	10:11:40
19		I don't recall exactly who negotiated on behalf of	10:11:48
20		YesCare.	10:11:51
21	Q	You don't recall exactly what -- what do	10:11:55
22		you recall?	10:12:00
23	A	I recall that YesCare and Geneva entered	10:12:00
24		into an agreement to continue the MSA services for	10:12:04
25		YesCare.	10:12:09

1	Q You say continue. So the agreement was	10:12:10
2	for Geneva to perform the same services for	10:12:13
3	YesCare that it had performed for the pre-merger	10:12:17
4	entities?	10:12:20
5	A I don't know about the same. So I'm not	10:12:22
6	here to compare agreements. They entered into	10:12:23
7	another agreement.	10:12:28
8	Q I'm trying to understand what you meant by	10:12:28
9	continue, Mr. Lefkowitz.	10:12:30
10	A I guess strike the word continue.	10:12:31
11	Q What word would you like to use instead?	10:12:36
12	A The agreement between YesCare and Geneva.	10:12:41
13	Q Okay. So what did Geneva agree to do for	10:12:43
14	YesCare?	10:12:50
15	A Manage services agreement.	10:12:52
16	Q And is that definition of manage services	10:13:01
17	the same as the prior one you gave?	10:13:04
18	A I don't know they were the same --	10:13:08
19	Q The managed services that Geneva was	10:13:10
20	performing for YesCare --	10:13:14
21	A I don't know -- again, I don't have	10:13:15
22	side-by-side of both agreements so I don't know if	10:13:17
23	it's the same or not. They both have agreement.	10:13:19
24	Q I'm not asking --	10:13:21
25	A You asked the same and I said I can't	10:13:22

1	testify to the word same.	10:13:26
2	Q Sure. I -- I was talking about the	10:13:28
3	definition of managed services. You provided a	10:13:30
4	definition earlier, and I'm not -- to be clear, I	10:13:35
5	want to make the -- make the record clear: I'm	10:13:39
6	not asking about whether the contracts have the	10:13:42
7	exact same language or anything like that.	10:13:46
8	I'm asking about the services that Geneva	10:13:47
9	performed for YesCare.	10:13:50
10	A The contract speaks for itself and Geneva	10:13:52
11	performed as per the contract.	10:13:58
12	Q Okay. Can you tell me anything Geneva did	10:13:59
13	for YesCare?	10:14:02
14	A Anything?	10:14:09
15	Q Yeah.	10:14:10
16	A Managed services.	10:14:11
17	Q And can you tell me anything more specific	10:14:12
18	that Geneva did for YesCare?	10:14:15
19	A All its credentialing and reporting.	10:14:19
20	Q What does credentialing mean? Let's take	10:14:25
21	those one at a time.	10:14:29
22	A Credentialing means? What does	10:14:32
23	credentialing mean? You're talking about, you	10:14:32
24	mean the English word credentialing, what it	10:14:32
25	means? Or the definition of credentialing? What	10:14:32

1 is -- 10:14:32

2 Q You said that -- you said Geneva did 10:14:53

3 credentialing for YesCare when I asked you what 10:14:55

4 specifically what Geneva did. 10:14:57

5 What credentialing did Geneva do for 10:14:58

6 YesCare? 10:15:01

7 A It's basically credentialing the validity 10:15:01

8 of transactions. 10:15:06

9 Q What transactions did Geneva credential 10:15:09

10 the validity of for YesCare? 10:15:14

11 A Financial transactions. 10:15:20

12 Q Can you name any? 10:15:21

13 A I think they're voluminous, and I think it 10:15:26

14 was provided to the committee. 10:15:32

15 Q I'm asking if you know of any transactions 10:15:34

16 that Geneva credentialed for YesCare. 10:15:37

17 A Hundreds of thousands. 10:15:40

18 Q And you can't name any? 10:15:44

19 A I should name you hundreds of thousands of 10:15:48

20 transactions that Geneva -- 10:15:50

21 Q I'm -- I'm asking for one. I'm asking for 10:15:52

22 one, Mr. Lefkowitz. 10:15:59

23 A Why don't you pull up the record and we'll 10:16:00

24 identify. 10:16:04

25 Q So you can't name one? 10:16:04

1	A	I could, but I think you're -- you're just	10:16:06
2		not asking a logical question. Geneva --	10:16:10
3	Q	Well, if you can name a transaction --	10:16:14
4	A	Wait a second, wait a second, wait a	10:16:17
5		second. I'm in the middle of talking.	10:16:19
6		Geneva Consulting provided credentialing	10:16:21
7		validity transaction on behalf of Valitas and on	10:16:24
8		behalf of YesCare. There is hundreds and hundreds	10:16:29
9		of thousands of transactions. Those reports were	10:16:32
10		given to the committee. You want me to identify	10:16:34
11		one. What does one mean? Identify one what?	10:16:37
12	Q	I'm trying to understand how Geneva	10:16:42
13		credentialed transactions.	10:16:45
14	A	You didn't ask me that. You asked me I	10:16:46
15		should name you a transaction. You didn't ask me	10:16:50
16		how.	10:16:52
17	Q	Yeah. I'm moving on to a different	10:16:52
18		question because you wouldn't answer that one.	10:16:55
19		So how did Geneva --	10:16:57
20	A	No.	10:16:58
21	Q	-- credential transactions?	10:16:59
22	MS. HAYWARD:	Objection, form, to the	10:16:59
23		sidebar.	10:17:00
24	A	Which question didn't I want to answer?	10:17:01
25		Say that again.	10:17:03

1 Q Can you name a transaction that Geneva 10:17:05
2 credentialed for YesCare? 10:17:08
3 A And I answered you that there were 10:17:09
4 hundreds and hundreds of thousands of transactions 10:17:11
5 on a daily basis. 10:17:14
6 Q Okay. 10:17:17
7 A Do you have a spectrum that you want me to 10:17:18
8 answer you if I recall it? Give me the 10:17:22
9 transaction, I'll tell you whether it recall it. 10:17:25
10 Q That's not my question. I'm asking what 10:17:27
11 Geneva did for YesCare. 10:17:29
12 You said they credentialed transactions. 10:17:30
13 Tell me a transaction that Geneva credentialed. 10:17:32
14 A I told you that it was given the 10:17:35
15 committee, the full report of all the transactions 10:17:39
16 that Geneva credentialed. 10:17:41
17 Q Okay. 10:17:42
18 A You have them. 10:17:43
19 Q So how did Geneva credential transactions? 10:17:45
20 A Through verifying the validity of it. 10:17:49
21 Q How did they verify the validity of them? 10:17:54
22 A Through -- through systems. 10:17:57
23 Q What systems? 10:18:00
24 A Financial software. 10:18:01
25 Q What software? 10:18:05

1	A Financial software.	10:18:06
2	Q You don't know the name of it?	10:18:09
3	A I don't recall the name.	10:18:12
4	Q Okay. How do you credential a transaction	10:18:14
5	through software?	10:18:17
6	A Basically the validity of -- of the	10:18:17
7	information.	10:18:26
8	Q How does the financial software tell you	10:18:28
9	the validity of the information?	10:18:30
10	A Based on the data.	10:18:33
11	Q What data?	10:18:34
12	A The data in the system.	10:18:36
13	Q So using a software that you don't	10:18:43
14	remember the name of and data in a system, you	10:18:48
15	were able to tell if transactions were valid?	10:18:53
16	A Why did you have to say about the	10:19:00
17	remembering the name of the software? What was	10:19:04
18	that again?	10:19:05
19	Q Do you not understand the question,	10:19:07
20	Mr. Lefkowitz?	10:19:11
21	A I didn't understand how remembering the	10:19:11
22	name of the software comes into the question	10:19:13
23	exactly. No.	10:19:16
24	Q Okay.	10:19:20
25	A What are you trying to say by remembering	10:19:21

1	the name of software? What does that got to do	10:19:23
2	with credentialing the validity of a transaction?	10:19:27
3	Q Well, if we knew the software, if you	10:19:29
4	would tell us the name, it would help us	10:19:32
5	understand how you did this process.	10:19:35
6	A By naming the name of the software you	10:19:36
7	will understand it better?	10:19:41
8	Q Sure.	10:19:42
9	A Really? Explain me how. How does the	10:19:42
10	name explain you the process?	10:19:47
11	Q I'm asking the question. I answered -- I	10:19:47
12	answered one of your questions. I'll rephrase the	10:19:48
13	question if you don't like the way I phrased it,	10:19:49
14	as a courtesy to you.	10:19:52
15	A I don't need -- I don't need any courtesy.	10:19:53
16	I need a clear question so I can give you a clear	10:19:57
17	answer.	10:19:59
18	Q Using the software that you described and	10:20:00
19	the data in the software, how do you tell whether	10:20:03
20	a transaction is valid?	10:20:08
21	A You want me to give you an example?	10:20:13
22	Q I -- if that's how you need to answer the	10:20:16
23	question. I'm just ask -- trying to understand	10:20:19
24	what Geneva did.	10:20:23
25	A If an invoice would pop up from Zach	10:20:24

1	Hemenway for a million dollars, the system would	10:20:24
2	reject it. We don't know who Zach Hemenway is and	10:20:32
3	there's no purpose for him billing a million	10:20:33
4	bucks.	10:20:37
5	Q Okay.	10:20:37
6	A So the system would reject it.	10:20:38
7	Q And why would the system not know who I	10:20:41
8	was?	10:20:44
9	A You're not recognized as a party of	10:20:44
10	interest.	10:20:52
11	Q So if I'm recognized as a party of	10:20:52
12	interest, then I get my million bucks?	10:20:55
13	A No. It's just one step.	10:20:58
14	Q What are the other steps?	10:20:59
15	A The purpose of billing; what services you	10:21:01
16	provide; matches up to our contract; if it matches	10:21:05
17	up to an agreement; if it matches up to an	10:21:10
18	arrangement.	10:21:13
19	Q And Geneva's software did this?	10:21:13
20	A Correct.	10:21:17
21	Q And that's what Geneva charged 500,000 a	10:21:17
22	month for?	10:21:23
23	A I didn't say that.	10:21:24
24	Q Okay. What else did Geneva do?	10:21:26
25	A Managed services.	10:21:29

1	Q	When you're talking about validating the	10:21:35
2		payments based on the data and the system, where	10:21:41
3		does the data come from?	10:21:44
4	A	In the transaction.	10:21:46
5	Q	Did Corizon accounting personnel provide	10:21:55
6		any of the data?	10:21:59
7	A	They too.	10:22:00
8	Q	They too, is that what you said?	10:22:04
9	A	Yes.	10:22:11
10	Q	Can you finish the sentence, they	10:22:12
11		too provided the --	10:22:16
12	A	My sentence is finished.	10:22:16
13	Q	When you said they too, do you mean that	10:22:18
14		the Corizon accounting people provided the data?	10:22:21
15	A	I said, they too.	10:22:24
16	Q	Did the Corizon people -- did the Corizon	10:22:29
17		accounting personnel provide data; yes or no?	10:22:33
18	A	I said they as well. They too.	10:22:36
19	Q	Provided -- okay. Thank you.	10:22:40
20		So other than this credentialing and	10:22:41
21		validation, what else did Geneva do?	10:22:47
22	A	Corporate restructuring, managed services.	10:22:53
23	Q	So those are just the terms that are in	10:22:59
24		the two agreements.	10:23:02
25		Is there any specific task or project you	10:23:04

1 can point to? 10:23:09

2 A Point where? There are scope of services 10:23:09

3 in the agreement. 10:23:14

4 Q Sure. Is there any specific task that 10:23:14

5 Geneva performed? 10:23:19

6 A I mean -- 10:23:22

7 Q Project -- 10:23:23

8 A I think -- I think we just went through 10:23:24

9 it. 10:23:27

10 Q Okay. All right. So Geneva received 10:23:27

11 500,000 a month from Corizon under the agreement 10:23:42

12 we saw. 10:23:45

13 Was that the only payment Geneva received 10:23:46

14 from Valitas or Corizon? 10:23:50

15 A The only payment in what period? 10:23:58

16 Q Any period from Valitas or Corizon. 10:24:02

17 A I believe so. 10:24:09

18 Q Okay. And was the Geneva contract 10:24:11

19 provided to Corizon management? 10:24:41

20 A Which Geneva contract? 10:24:50

21 Q The December 6th, the -- excuse me, 10:24:51

22 December 8th, I believe you -- you preferred, the 10:24:56

23 contract that we looked at earlier between Valitas 10:25:00

24 and Geneva. 10:25:03

25 A The Valitas, not Corizon. Where does 10:25:04

1	Corizon get into it?	10:25:09
2	Q The December 2021 contract between Valitas	10:25:09
3	and Geneva, was that provided to Corizon	10:25:13
4	management?	10:25:17
5	A You're asking if the Geneva/Valitas	10:25:20
6	agreement was provided to Corizon management?	10:25:24
7	Q Correct?	10:25:27
8	A How does Corizon get in --	10:25:27
9	Q Corizon --	10:25:29
10	A How does Corizon get in?	10:25:30
11	Q Who was paying Geneva 500,000 a month?	10:25:32
12	A Valitas.	10:25:37
13	Q All right. Was it provided to Valitas	10:25:39
14	management?	10:25:44
15	A I believe so.	10:25:46
16	MR. HEMENWAY: And let's do exhibit, I	10:25:51
17	think we're on 7, Malcolm.	10:25:53
18	REMOTE TECHNICIAN: Correct.	10:25:55
19	MR. HEMENWAY: 155163.	10:25:55
20	REMOTE TECHNICIAN: Stand by.	10:25:59
21	MR. HEMENWAY: Thank you.	10:26:01
22	(Exhibit 7 marked for identification.)	10:26:02
23	BY MR. HEMENWAY:	10:26:02
24	Q So Exhibit 7 is a December 19th, 2022,	10:26:23
25	e-mail from Jeff Sholey to you.	10:26:27

1	A Okay.	10:26:32
2	Q And did Jeff Sholey have a role at	10:26:33
3	Valitas?	10:26:39
4	A I think it says Jeff Sholey at Corizon	10:26:39
5	Health.	10:26:49
6	Q That's not an answer to my question.	10:26:49
7	Do you know if Jeff Sholey had a role at	10:26:51
8	Valitas?	10:26:54
9	A I'm sure he did. I don't recall what	10:26:54
10	date.	10:26:57
11	Q And as you noted, Jeff Sholey had a role	10:26:57
12	at Corizon Health, correct?	10:27:03
13	A Correct.	10:27:05
14	Q Was he the CFO?	10:27:06
15	A Right.	10:27:10
16	Q And in this document, in this e-mail, he's	10:27:10
17	asking for support for accounting for several	10:27:17
18	wires?	10:27:20
19	A Okay.	10:27:21
20	Q And he references, We need an underlying	10:27:22
21	agreement for the Geneva Consulting amounts.	10:27:25
22	So why would the Corizon CFO need an	10:27:28
23	underlying agreement for the Geneva Consulting	10:27:34
24	amounts?	10:27:37
25	A I don't know.	10:27:41

1 Q Do you know if Mr. Sholey was provided a 10:27:47
2 copy of the Geneva Consulting agreement after 10:27:52
3 this? 10:27:54
4 A I don't recall. 10:27:55
5 Q Okay. And do you know what amounts he's 10:27:55
6 referring to in December 2021? 10:28:06
7 A No. 10:28:17
8 Q All right. 10:28:17
9 MR. HEMENWAY: Let's go to -- do we have 10:28:18
10 164, the attachment to this? 10:28:22
11 REMOTE TECHNICIAN: Sorry, Counsel, is 10:28:31
12 that the Bates number? 10:28:32
13 MR. HEMENWAY: Sorry. I was -- that was 10:28:34
14 not directed at you, Malcolm. 10:28:36
15 REMOTE TECHNICIAN: My apologies. 10:28:38
16 MR. HEMENWAY: We're sending you the next 10:28:41
17 exhibit. It's just the attachment to the e-mail 10:28:43
18 we had open. 10:28:45
19 REMOTE TECHNICIAN: All right. I will 10:28:46
20 look for that. Stand by. 10:28:47
21 MR. HEMENWAY: And I think for counsel, 10:29:10
22 it's -- no, sorry. It's -- so we're pulling up a 10:29:12
23 spreadsheet that is -- it was produced in native 10:29:18
24 so it's not going to be Bates stamped, but it is 10:29:22
25 Debtor00155164. It is the attachment to the prior 10:29:25

1	e-mail.	10:29:33
2	BY MR. HEMENWAY:	10:29:38
3	Q So Mr. Lefkowitz, you see on December 9th,	10:29:38
4	2021, Geneva Consulting wire, 3 million?	10:29:42
5	A Yes.	10:29:45
6	Q Were those funds wired to Geneva from	10:29:45
7	Corizon?	10:29:51
8	A Corizon? I don't know where it was wired	10:29:52
9	from.	10:29:55
10	Q Were they wired from Valitas?	10:29:55
11	A I don't know.	10:29:58
12	Q So you know that Geneva received them, but	10:30:00
13	you don't know where they came from?	10:30:08
14	A I don't know sitting here today. I don't	10:30:09
15	have the backup transaction in front of me.	10:30:11
16	Your -- you're pulling up selective documents.	10:30:14
17	Q Sure.	10:30:17
18	A It was provided to you where the wire came	10:30:18
19	from. So you can pull that up and ask me if I'm	10:30:21
20	aware of it.	10:30:24
21	Q Yeah. I'm just asking what you know.	10:30:24
22	I'm -- and if you don't know, that's fine.	10:30:26
23	You don't -- you don't remember telling	10:30:29
24	anybody to pay this \$3 million?	10:30:31
25	A I'm sure I did, but I don't recall the	10:30:33

1 specifics of it. It's part of the Geneva 10:30:40
2 contract. 10:30:42
3 Q And what is the \$3 million in exchange 10:30:42
4 for? 10:30:45
5 A It was a retainer on the MSA agreement. 10:30:48
6 Q And why did Geneva need a retainer? 10:30:51
7 A To go ahead and perform all the legal and 10:30:58
8 accounting work and all the MSA work. 10:31:04
9 Q Is that the work you described earlier? 10:31:06
10 A Correct. 10:31:11
11 Q And what was that work again? Managed 10:31:13
12 services? 10:31:20
13 A Yeah. Go ahead, continue. Read back to 10:31:23
14 what I said. 10:31:25
15 Q So what -- what did Geneva use the 10:31:26
16 \$3 million for in terms of that work? 10:31:31
17 A It was a retainer for its services, to be 10:31:33
18 able to go out and hire outside consulting work 10:31:40
19 and do its own operations on behalf of the 10:31:43
20 bankrupt company that we didn't know would be able 10:31:47
21 to afford to pay the work. 10:31:51
22 Q And were you ever asked to explain what 10:31:53
23 the \$3 million was going to be used for? 10:32:00
24 A Yes. 10:32:04
25 Q And what did you say? 10:32:04

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1 You asked me if anyone asked me. I said 10:33:33
2 there was one individual that interfered with our 10:33:36
3 resuscitation. And he asked as well about how 10:33:41
4 come Geneva was hired and why Geneva is being paid 10:33:44
5 and what Geneva is going to do. And he basically 10:33:46
6 was trying to torpedo the resuscitation. 10:33:51
7 He had a -- he had an agenda to pull the 10:33:56
8 company into bankruptcy and ownership in Geneva 10:33:58
9 had a different agenda. 10:34:03
10 Q Did he want that money to -- did he want 10:34:04
11 money to come into the company from Geneva? 10:34:09
12 A No. He wanted the company to file for 10:34:13
13 bankruptcy. 10:34:16
14 Q I see. Okay. 10:34:16
15 MR. HEMENWAY: We can take that exhibit 10:34:24
16 down. 10:34:26
17 Q And we talked about your agreement with 10:34:31
18 YesCare. 10:34:33
19 Was there another agreement -- let me 10:34:34
20 rephrase. 10:34:39
21 There was another agreement that came out 10:34:39
22 of the divisional merger where Geneva was a party, 10:34:42
23 correct? 10:34:46
24 A A lot of agreements. Which one are you 10:34:46
25 referring to? 10:34:49

1 Q The facilitator agreement. 10:34:55

2 A The facilitator agreement for who? 10:34:58

3 Q We can pull it up. Let's -- let's back up 10:35:01

4 for a second. 10:35:02

5 What was Geneva's role in planning the 10:35:03

6 divisional merger? 10:35:06

7 A They were -- they were undertaken to 10:35:07

8 facilitate the funding agreement from the lender. 10:35:14

9 Q And we'll come back to that in a minute. 10:35:18

10 But in terms of the planning of the divisional 10:35:22

11 merger, how did Geneva participate in that? 10:35:25

12 A I don't think Geneva had a role in the 10:35:27

13 divisional merger. 10:35:31

14 Q Well, it was party to agreements that was 10:35:33

15 executed as part of the divisional agreement. 10:35:36

16 A Say it again. 10:35:37

17 Q Geneva was party to agreements that were 10:35:39

18 executed in the divisional merger, correct? 10:35:41

19 A There were hundreds and hundreds of 10:35:45

20 agreements and documents, so you've got to pull up 10:35:49

21 and tell me which documents you're referring to. 10:35:52

22 Q Okay. We'll go ahead and just pull up the 10:35:55

23 facilitator agreement. 10:35:58

24 MR. HEMENWAY: And that is the document 10:35:59

25 that begins with YC and ends in 36150, Malcolm. 10:36:01

1 REMOTE TECHNICIAN: Sure. Counsel, just 10:36:06
2 to clarify, did you want that spreadsheet marked 10:36:07
3 as an exhibit or not? 10:36:10
4 MR. HEMENWAY: I suppose -- yeah. Yes. 10:36:12
5 Since we questioned about it. I'm fine -- Melissa 10:36:18
6 and Tad, it could either be, you know, the second 10:36:21
7 page of the exhibit where we had the e-mail or it 10:36:27
8 can -- 10:36:30
9 MS. HAYWARD: I would put it as the second 10:36:31
10 page of that exhibit, since it was an attachment 10:36:34
11 to the e-mail. 10:36:37
12 MR. HEMENWAY: So Malcolm, we'll make that 10:36:37
13 part of the exhibit that was immediately prior to 10:36:40
14 that. 10:36:42
15 REMOTE TECHNICIAN: Okay. I will make a 10:36:42
16 note of that, and that will make this Exhibit 8. 10:36:44
17 (Exhibit 8 marked for identification.) 10:36:47
18 BY MR. HEMENWAY: 10:36:49
19 Q So Mr. Lefkowitz, we're pulling up the 10:36:49
20 facilitator agreement that you referenced. And as 10:36:52
21 you referenced, this was something that was one of 10:36:55
22 the hundreds of documents that were executed as 10:36:58
23 part of the divisional merger, and Geneva 10:37:01
24 Consulting is a party to it. 10:37:04
25 My question was: Given that Geneva was a 10:37:06

1 party to agreements that were all signed as part 10:37:10
2 of the divisional merger, it -- I'm assuming that 10:37:15
3 Geneva did not see those agreements the first time 10:37:18
4 minutes before it signed them, but rather was 10:37:22
5 involved in the planning for the divisional 10:37:25
6 merger; is that correct? 10:37:28
7 A I was taught in law school never to use 10:37:30
8 the word assume. So you just said you assumed 10:37:33
9 something. 10:37:37
10 What did you exactly assume? 10:37:37
11 Q So Geneva, as a party to this 10:37:39
12 agreement -- 10:37:43
13 A Can you scroll down and let me see who 10:37:44
14 signed this agreement? 10:37:46
15 Q Sure. 10:37:47
16 A Okay. 10:38:01
17 Q So Geneva is a party to this agreement and 10:38:01
18 this agreement was signed on the same day as many 10:38:03
19 of the other divisional merger agreements. 10:38:06
20 A Okay. 10:38:09
21 Q My -- who at Geneva was involved in 10:38:09
22 negotiating and drafting this agreement? 10:38:14
23 A Scroll down to the signature page again. 10:38:18
24 Q It's Zalman Schapiro on the signature 10:38:22
25 page, if that helps. 10:38:26

1 with the facilitator agreement, or was it just the 10:39:47
2 parties that are on the agreement? 10:39:50
3 A I don't recall how it came about. 10:39:52
4 Q Okay. Do you recall anybody other than 10:39:55
5 Zalman Schapiro who was involved with it? 10:40:00
6 A No. 10:40:04
7 Q Okay. And what did Geneva do for the 10:40:04
8 lender in connection with this agreement? 10:40:10
9 A They facilitated the flow of funds. 10:40:12
10 Q How did they do that? 10:40:19
11 A It was a funding agreement. And there's a 10:40:20
12 scope of services in the funding agreement and 10:40:27
13 Geneva followed it. 10:40:30
14 Q And who followed -- who made sure that 10:40:33
15 Geneva was following the agreement? 10:40:37
16 A Who released it? When you say making 10:40:43
17 sure, what does making sure mean? 10:40:46
18 Q Yeah. It's -- I'll rephrase. 10:40:48
19 Who -- who at Geneva worked on performing 10:40:51
20 the services under this agreement? 10:40:54
21 A Same folks. 10:40:56
22 Q Who is that? 10:40:59
23 A Zalman and team. 10:41:00
24 Q And what did Zalman and team do to 10:41:05
25 evaluate whether something fell under this 10:41:12

1 agreement or not? 10:41:15

2 A They provided services. 10:41:17

3 Q How did they provide them? 10:41:24

4 A According to the scope of this agreement. 10:41:28

5 Q Did they send e-mails? 10:41:31

6 A (No response.) 10:41:46

7 Q Mr. Lefkowitz, did Zalman and team send 10:41:48

8 any e-mails in connection with these services? 10:41:52

9 A We provided you all the e-mails. 10:41:54

10 Q Yeah. You mentioned you reviewed all the 10:41:56

11 documents Geneva produced. 10:41:58

12 Did you see any e-mails from Zalman 10:42:00

13 Schapiro that had services being performed under 10:42:02

14 this agreement? 10:42:04

15 A I don't recall what I reviewed. 10:42:04

16 Q Did you see any e-mails from anybody else 10:42:05

17 that had services being performed under this 10:42:08

18 agreement? 10:42:11

19 A I don't recall what I reviewed in 10:42:12

20 documents, but things were running very fast. It 10:42:14

21 was mainly done on phone conversations. 10:42:19

22 Q Phone conversations between whom? 10:42:23

23 A The Geneva folks, between the Corizon 10:42:27

24 folks, between the M2 folks. 10:42:30

25 Q And when you say the Geneva folks, that's 10:42:33

1	I -- now you're asking me if I was involved. I	10:43:46
2	said I was involved as well.	10:43:49
3	Q Okay. What was your role?	10:43:51
4	A Director.	10:43:55
5	Q Of Geneva?	10:43:58
6	A Correct.	10:44:00
7	Q What was your role in performing the	10:44:00
8	services?	10:44:03
9	A To be aware and to approve.	10:44:05
10	Q So you approved payments under the funding	10:44:08
11	agreement?	10:44:11
12	A In general, yes.	10:44:14
13	Q What's the distinction with, in general?	10:44:17
14	You didn't approve specific payments?	10:44:20
15	A In general, I was involved. It passed	10:44:25
16	through my desk.	10:44:29
17	Q Okay. So other than it passing through	10:44:30
18	your desk, were you involved?	10:44:34
19	A I was involved as a director.	10:44:37
20	Q I don't know what that means.	10:44:43
21	A I don't know either because you're asking	10:44:45
22	the same question over and over.	10:44:47
23	Q I'm asking what you did and you said --	10:44:49
24	A I -- and I said what I did. I'm a	10:44:52
25	director --	10:44:54

1	Q Okay.	10:44:55
2	A -- of Geneva. I'm involved knowing	10:44:55
3	exactly what's going on in Geneva, including	10:45:00
4	approval of transactions.	10:45:03
5	If this is not English enough, I can't	10:45:06
6	help you, sir.	10:45:09
7	Q So other than knowing what's going on at	10:45:10
8	Geneva --	10:45:13
9	A And approving.	10:45:14
10	Q -- and approving --	10:45:16
11	A Transactions.	10:45:19
12	Q Did you approve each transaction?	10:45:20
13	A I said in general, it passed through my	10:45:23
14	desk.	10:45:26
15	Q What's the difference between approving	10:45:28
16	transactions and in general it passing through	10:45:31
17	your desk?	10:45:34
18	A Needless to say that if an invoice of \$125	10:45:35
19	for postage stamps comes through, I wasn't	10:45:40
20	involved in it.	10:45:44
21	Q What about an invoice for \$400,000?	10:45:45
22	A I was.	10:45:51
23	Q And what was your involvement?	10:45:51
24	A To make sure that -- that everyone	10:45:53
25	involved did the right thing.	10:46:00

1	Q	What's the right thing?	10:46:00
2	A	What is the right thing?	10:46:05
3	Q	You said that everyone involved did the	10:46:07
4		right thing?	10:46:09
5		What does that mean?	10:46:10
6	A	Was doing the right thing.	10:46:11
7		You know, sir, you're going to have to	10:46:13
8		stop asking me on English words what they mean.	10:46:15
9		I'm not going to go through the abuse of this	10:46:19
10		deposition.	10:46:19
11		When I say the right -- everyone involved	10:46:21
12		doing the right thing, if you don't understand	10:46:23
13		what that means, I can't help you any further.	10:46:24
14	Q	I'm going to keep asking my questions.	10:46:29
15		I --	10:46:31
16	A	You can keep asking -- you can keep asking	10:46:32
17		the questions and creating a record of trying	10:46:34
18		to -- to create a record that I'm evasive in	10:46:38
19		responding. And I'm telling you that I'm	10:46:44
20		responding in the English language.	10:46:46
21		And my job as a director is that anyone	10:46:48
22		that touches transaction does the right thing.	10:46:51
23		And you say that you don't know what the right	10:46:53
24		thing means.	10:46:55
25	Q	So --	10:46:57

1	A	Isn't that --	10:46:57
2	Q	Mr. Lefkowitz, I know you said you've done	10:46:58
3		a hundred of these. But when a witness in a	10:47:02
4		deposition answers a question and uses their own	10:47:04
5		words, we lawyers want to know what they mean by	10:47:07
6		those words so that we understand what your	10:47:10
7		testimony is.	10:47:12
8		So you can say it --	10:47:14
9	A	But you don't -- you don't understand	10:47:16
10		my -- if you don't understand my testimony, the	10:47:17
11		English language, I can't help you any further.	10:47:20
12	Q	You can and you will. I'm asking	10:47:23
13		questions.	10:47:26
14		So --	10:47:27
15	A	You say that I can and I will; and I say I	10:47:28
16		can't and I won't.	10:47:32
17	Q	That's fine.	10:47:33
18	A	I will answer you -- I will answer you in	10:47:33
19		English and the transcript will read exactly what	10:47:36
20		it says.	10:47:39
21	Q	All right. We --	10:47:40
22	A	As a director -- I, as a director -- I as	10:47:40
23		a director of Geneva Consulting monitored and	10:47:44
24		approved transactions and monitored approved the	10:47:47
25		process that everyone who touches a transaction	10:47:51

1	does the right thing.	10:47:55
2	Q Okay. And you're not going to tell us	10:47:57
3	what you mean by that?	10:48:02
4	A Mean by what?	10:48:03
5	Q Does the right thing.	10:48:04
6	A Does the right thing. Does not do any	10:48:07
7	errors and does not do anything wrong. That's	10:48:10
8	what right thing means.	10:48:13
9	Q Understood. How would you evaluate	10:48:14
10	whether an amount should be paid?	10:48:17
11	A By reviewing the transaction.	10:48:21
12	Q What would you review?	10:48:24
13	A The underlying documents.	10:48:28
14	Q Okay. And when you approved a	10:48:29
15	transaction, who -- would you direct somebody to	10:48:40
16	pay it?	10:48:44
17	A I didn't direct. I just approved.	10:48:44
18	Q How would you approve?	10:48:50
19	A We went through the transactions and I	10:48:51
20	approved yes or no.	10:48:55
21	Q Did you send an e-mail that says yes or	10:48:57
22	no?	10:48:59
23	A Mostly was done over the phone and verbal.	10:49:00
24	Q So your testimony is you called someone	10:49:04
25	and said, hey, pay this or don't pay this?	10:49:08

Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

101

1	A	Called someone or they called me.	10:49:13
2	Q	And who did you call?	10:49:16
3	A	Zalman and team.	10:49:19
4	Q	Okay. Or Zalman and team called you?	10:49:22
5	A	Correct.	10:49:26
6	Q	Okay.	10:49:26
7	MR. HEMENWAY:	Let's take -- let's take a	10:49:46
8		five-minute break. And then I think we'll be	10:49:48
9		close to wrapping up Geneva.	10:49:50
10		Melissa, I think we can move to PharmaCorr	10:49:54
11		after that, but I know that -- I believe the	10:49:56
12		witness is on Eastern time, so we're getting	10:49:58
13		closer to lunch. Do we want to, you know, go for	10:50:01
14		a little bit after we come back and then break, or	10:50:04
15		do we want to go right into PharmaCorr?	10:50:06
16	MS. HAYWARD:	I'll let the witness make	10:50:08
17		that decision.	10:50:10
18	THE WITNESS:	Let's go right into it.	10:50:11
19	MS. HAYWARD:	Mr. Lefkowitz, do you need a	10:50:11
20		lunch break?	10:50:11
21	THE WITNESS:	I don't need a lunch break.	10:50:14
22		I work through the day.	10:50:15
23	MR. HEMENWAY:	Okay. Well, then let's	10:50:17
24		take ten. We'll break at 10 -- it's 10:50. We'll	10:50:19
25		come back at 11:00, and we'll finish up with	10:50:22

Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

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1	Geneva and then move to PharmaCorr.	10:50:26
2	THE VIDEOGRAPHER: Going off the record.	10:50:27
3	The time is 10:50 a.m.	10:50:29
4	(Whereupon a break was had.)	10:50:30
5	THE VIDEOGRAPHER: All right. The time is	11:04:12
6	11:04 a.m. We're back on the record.	11:04:17
7	BY MR. HEMENWAY:	11:04:18
8	Q All right. Mr. Lefkowitz, can you still	11:04:18
9	hear me okay?	11:04:20
10	A Yes.	11:04:21
11	Q All right. So, we talked about transfers	11:04:22
12	to Geneva from Valitas.	11:04:27
13	Has Geneva received funds from YesCare as	11:04:33
14	well?	11:04:38
15	A Geneva was -- I mean, as far as fees is	11:04:38
16	concerned?	11:04:46
17	Q Any funds. But yeah, I'm -- I'm assuming	11:04:47
18	it would be fees.	11:04:50
19	A Let's not go by assumption.	11:04:51
20	Which fees are you talking about? Fees to	11:04:55
21	pay MSA arrangement or fees for Geneva?	11:04:57
22	Q What's the difference?	11:05:00
23	A You tell me the difference.	11:05:02
24	Q I'm -- you're -- you're drawing a	11:05:09
25	distinction, Mr. Lefkowitz.	11:05:13

1	What funds has Geneva received from	11:05:14
2	YesCare?	11:05:17
3	A I don't know they've received any funds.	11:05:17
4	Q You don't know whether Geneva's gotten any	11:05:22
5	funds from YesCare?	11:05:27
6	A YesCare directly? I don't believe so.	11:05:28
7	Q How about indirectly?	11:05:33
8	A Again, it also depends on what funds	11:05:34
9	you're talking about. You're talking about MSA	11:05:40
10	funds or you're talking about fee funds.	11:05:43
11	Q I'm talking about -- let's start with the	11:05:50
12	MSA funds.	11:05:52
13	Has Geneva received MSA funds from	11:05:54
14	YesCare?	11:05:58
15	A Yeah. Geneva managed the MSA arrangement	11:05:58
16	for YesCare.	11:06:02
17	Q Has Geneva received MSA funds from	11:06:02
18	YesCare?	11:06:06
19	A Geneva managed the MSA financial affairs	11:06:07
20	for YesCare.	11:06:16
21	Q Does YesCare pay Geneva for performing	11:06:23
22	services?	11:06:26
23	A I know they billed YesCare, but I'm not	11:06:29
24	sure if YesCare paid it.	11:06:33
25	Q You know that Geneva bills YesCare. When	11:06:35

1 you said they, you were talking about YesCare? 11:06:42

2 A Correct. 11:06:45

3 Q But you don't know if Geneva gets paid to 11:06:45

4 do -- 11:06:49

5 A I didn't say gets paid. I'm not certain 11:06:49

6 if it was paid or not. 11:06:53

7 Q Okay. You don't know if Geneva has 11:06:54

8 received any funds from YesCare? 11:06:57

9 A I don't have the records in front of me, 11:06:59

10 but if you're -- if you have a specific 11:07:04

11 transaction that you want to discuss, I can give 11:07:07

12 you the response. 11:07:10

13 Q So you're -- you're a director at Geneva 11:07:15

14 and you are involved in the services Geneva 11:07:16

15 provides to YesCare, correct? 11:07:20

16 A Correct. Correct. 11:07:22

17 Q And your testimony is you don't know 11:07:24

18 whether Geneva is paid for those services? 11:07:25

19 A I said Geneva bills YesCare. I'm 11:07:32

20 uncertain today if those are outstanding or not. 11:07:39

21 I can go back and check the records, and if it's 11:07:42

22 outstanding, if YesCare owes Geneva, but I can't 11:07:45

23 testify today without having information in front 11:07:49

24 of me. 11:07:51

25 Q Okay. The contract we looked at was dated 11:07:52

1	May 2022?	11:07:55
2	A Correct.	11:07:58
3	Q And is that contract still in place?	11:07:58
4	A Yes.	11:08:02
5	Q So in the last 15 months, you don't know	11:08:03
6	whether Geneva received any payment for services	11:08:06
7	performed under that contract?	11:08:09
8	A I didn't say that. You didn't ask me	11:08:10
9	that.	11:08:15
10	Q Did Geneva receive payment for services	11:08:19
11	performed under that contract in 2022?	11:08:22
12	A I believe so.	11:08:25
13	Q In the first three months of 2023?	11:08:28
14	A I don't know about dates and months	11:08:34
15	without looking at records, but I know YesCare was	11:08:36
16	paying Geneva for their services. It was	11:08:39
17	reconciled based on ADP, but I wouldn't have the	11:08:43
18	precise information in front of me unless you	11:08:46
19	showed it to me.	11:08:48
20	Q Gotcha. So you do know that Geneva	11:08:49
21	received payments for its services under that MSA	11:08:51
22	contract?	11:08:54
23	A Correct.	11:08:56
24	Q Okay. Did Geneva receive payment from	11:08:56
25	YesCare for anything else?	11:09:00

1	A I don't believe so.	11:09:03
2	Q Did Geneva ever ask YesCare to pay its	11:09:05
3	credit card expenses?	11:09:09
4	A Geneva has billed for out-of-pocket	11:09:13
5	expenses. Yes.	11:09:16
6	Q Did YesCare pay those?	11:09:17
7	A I believe so.	11:09:20
8	Q Did Geneva ask YesCare for any other	11:09:23
9	money?	11:09:30
10	A No.	11:09:30
11	Q Did YesCare send Geneva any other money?	11:09:30
12	A Not that I'm aware of.	11:09:34
13	Q Okay. Have you performed any services for	11:09:36
14	YesCare other than the ones you described from the	11:09:41
15	managed services agreement?	11:09:45
16	A Only the scope of the agreement and the	11:09:47
17	facilitator agreement.	11:09:54
18	MR. HEMENWAY: I'm sorry, court reporter,	11:09:54
19	could you read that back?	
20	THE REPORTER: I was seeing if you were	
21	going to clarify because I did not hear the	
22	second agreement.	
23	MR. HEMENWAY: Yeah. I didn't hear it	
24	either.	
25	BY MR. HEMENWAY:	

1	Q Mr. Lefkowitz, I can ask the question	11:10:13
2	again or if you recall your answer you can just	11:10:14
3	repeat it?	11:10:15
4	A I said Geneva only provided for YesCare	11:10:15
5	services based on the managed service agreement.	11:10:18
6	Q Gotcha. And does the managed service	11:10:23
7	agreement provide for reimbursement of	11:10:24
8	out-of-pocket expenses?	11:10:27
9	A I don't have the agreement in front of me,	11:10:31
10	but I believe so.	11:10:32
11	Q And what types of expenses did Geneva	11:10:33
12	incur performing services for YesCare?	11:10:37
13	A Everything from travel to any other	11:10:40
14	expenses.	11:10:50
15	Q And how are those -- how is travel related	11:10:51
16	to managed services?	11:10:54
17	A Any travel that Geneva did on behalf of	11:11:00
18	YesCare. It's fully detailed in the invoicing, so	11:11:04
19	I don't know what you're referring to. But if you	11:11:08
20	have a detailed invoice, I can explain.	11:11:10
21	Q I'm asking more generally.	11:11:13
22	So you -- you said that the credit	11:11:14
23	card expenses --	11:11:17
24	A Generally -- generally is out-of-pocket	11:11:18
25	expenses, just like a law firm bills --	11:11:20

1 Q Sure. 11:11:20

2 A -- for out-of-pocket expenses, and just 11:11:22
3 like an accountant, CPA, bills for out-of-pocket 11:11:25
4 expense, so does a consultant bill for 11:11:29
5 out-of-pocket expenses. 11:11:33

6 Q That's a -- I appreciate that. So -- 11:11:33

7 A We bill for out-of-pocket expenses. And 11:11:33
8 we got reimbursed, those were detailed in invoices 11:11:35
9 and it was detailed from the payment or it was 11:11:39
10 detailed in the approval. 11:11:41

11 Q So let's use the example you gave. So 11:11:42
12 your attorney, Mr. Davidson, if he were to travel 11:11:46
13 to court to appear on behalf of Geneva, he would 11:11:49
14 bill his expenses for traveling there because he 11:11:55
15 has to appear in court. 11:12:00

16 What was the travel that Geneva was 11:12:01
17 billing for? How was it related to the services 11:12:03
18 it was performing? 11:12:09

19 A If I had to fly down to Houston to meet 11:12:09
20 with the counsel, or if I had to rent a car and if 11:12:13
21 I had to lodge in a hotel, those would have been 11:12:15
22 out-of-pocket expenses. 11:12:19

23 Q Gotcha. So all of your travel is part of 11:12:20
24 the expenses of Geneva? 11:12:24

25 A I didn't say all of my travel. I said 11:12:27

1 travel related to the MSA. I didn't say all my 11:12:30
2 travel. 11:12:32

3 Q That was a bad question by me. I 11:12:33
4 apologize. 11:12:35

5 Your travel relating to YesCare is Geneva 11:12:35
6 expenses; is that correct? 11:12:38

7 A My travel or anybody on the team -- on the 11:12:39
8 team travel. 11:12:43

9 Q And who is the team? 11:12:44

10 A Zalman and team. 11:12:45

11 Q Gotcha. And what other types of expenses 11:12:49
12 do you incur performing services for YesCare other 11:12:57
13 than travel? 11:13:01

14 A Out-of-pocket expenses, my friend. 11:13:02
15 Whether it deals with anything, printing -- travel 11:13:05
16 is just an easy analogy, but -- 11:13:09

17 Q Meals? 11:13:13

18 A -- could be anything. I'm not sure. 11:13:13
19 Whatever it's -- whatever was used is 11:13:16
20 out-of-pocket expenses. 11:13:19

21 Q Okay. Incurred by you and Zalman and 11:13:19
22 team? 11:13:23

23 A The company. 11:13:26

24 Q And your work -- 11:13:26

25 A And the company in general. 11:13:28

1 Q Who is the company in general? 11:13:29

2 A Geneva. If Geneva bought a broom to sweep 11:13:31
3 the conference room so there could be a meeting, 11:13:37
4 it billed for the broom. 11:13:39

5 Q And what would buying a broom have to do 11:13:47
6 with managed services? 11:13:50

7 A I don't know. I gave you -- I gave you a 11:13:50
8 stupid example because you're asking me stupid 11:13:53
9 questions. You're talking to me about 11:13:57
10 out-of-pocket expenses and you're trying to rack 11:13:59
11 my brain what out-of-pocket expense is. The 11:14:02
12 easier would have been instead of seven lawyers 11:14:04
13 listening to this, if you pull out the 11:14:05
14 out-of-pocket expense bill and identify a line 11:14:06
15 item and we could talk about the line item. 11:14:09

16 That's why I told you about a broom. Now 11:14:11
17 you want to talk about -- 25 minutes about what a 11:14:12
18 broom has got to do with the managed service 11:14:15
19 agreement. I'm just saying some out-of-pocket 11:14:18
20 expense. Whatever the out-of-pocket expense was 11:14:20
21 approved as part of the managed service agreement, 11:14:23
22 we billed and they paid. 11:14:26

23 Q Who approved the out-of-pocket expenses 11:14:28
24 and said they were a part of the managed services 11:14:31
25 agreement? 11:14:33

1	A I did.	11:14:33
2	Q And was that in your role at Geneva?	11:14:34
3	A Correct.	11:14:40
4	Q And who decided for YesCare that they were	11:14:41
5	permissible expenses under the managed services	11:14:46
6	agreement?	11:14:50
7	MR. DAVIDSON: Objection, form.	11:14:57
8	Q YesCare had to -- YesCare had to sign off	11:14:59
9	on paying the expenses -- who --	11:15:02
10	A Whatever the -- whatever the protocol in	11:15:08
11	YesCare is.	11:15:10
12	Q And you don't know that, even though	11:15:10
13	Geneva submitted --	11:15:17
14	A I do. I do know that, but I'm here for	11:15:17
15	Geneva. I'm not here for YesCare.	11:15:20
16	Q And Geneva -- you submitted the expenses	11:15:24
17	for Geneva, but you don't know how YesCare	11:15:28
18	approved them?	11:15:30
19	A I do know.	11:15:31
20	Q And you're refusing to answer that because	11:15:32
21	it's how YesCare approved Geneva's expense?	11:15:40
22	A No. I refuse to answer it because we came	11:15:44
23	to an agreement with the UCC committee and counsel	11:15:46
24	that I'll be here today as a corporate	11:15:50
25	representative of Geneva to testify Geneva, and	11:15:53

1 not on behalf of -- not on behalf of YesCare. 11:15:56

2 And you have done your inquiries on behalf 11:15:59

3 of YesCare. So you have all the information on 11:16:02

4 behalf of YesCare. So you're asking me about 11:16:05

5 testifying about YesCare today. The answer is I'm 11:16:07

6 not willing to testify on behalf of YesCare. I'm 11:16:10

7 here to testify on behalf of Geneva. 11:16:13

8 Q Okay. So the topic is Geneva's 11:16:15

9 relationship with YesCare. YesCare approving 11:16:22

10 Geneva's expenses is within that. But we -- 11:16:25

11 A There's obviously -- there's obviously 11:16:27

12 approval on both sides of it. 11:16:29

13 Q We can keep -- 11:16:30

14 A YesCare -- YesCare will not pay unless 11:16:31

15 it's approved by the YesCare team. Geneva will 11:16:34

16 not pay unless it's approved by the Geneva team. 11:16:37

17 So there's approvals on both sides of it. 11:16:40

18 Q Sure. And both -- both teams have a 11:16:44

19 leader, correct? 11:16:45

20 A Both teams -- both teams are interrelated 11:16:47

21 with protocol exactly how the process should work. 11:16:52

22 Q Exactly. Okay. So you said you reviewed 11:16:56

23 the documents that Geneva produced, correct? 11:17:03

24 A Yeah. In general, correct. Yeah. 11:17:09

25 Q And are you aware of how those documents 11:17:11

1 were -- were gathered? And I'm not asking about 11:17:14
2 communications with counsel. 11:17:18

3 I just mean, generally, do you know where 11:17:18
4 the documents came from? 11:17:21

5 A The documents came from various sources. 11:17:24

6 Q Do you know who those sources are? 11:17:28

7 A We produced the -- counsel asked us to 11:17:34
8 produce it and we produced it. 11:17:38

9 Q So one of the topics today is the 11:17:39
10 personnel at Geneva who are involved in the 11:17:42
11 relationship with these parties. And I'm asking 11:17:44
12 who you got documents from because, presumably, 11:17:49
13 those people would be involved in that 11:17:53
14 relationship. But I don't want to assume. 11:17:55

15 Do you know who you got documents from 11:17:58
16 that you produced to us? 11:18:00

17 A There's a list of document requests and we 11:18:02
18 produced it. We sourced it from wherever the 11:18:09
19 documents come from. Some come from the database. 11:18:11
20 Some come from e-mails. Some come from hard 11:18:14
21 copies. Some come from, you know, outside legal. 11:18:18

22 Q Sure. 11:18:21

23 A But we produced them all from various 11:18:22
24 sources. 11:18:24

25 Q Yeah. And we're not trying to get into, 11:18:24

1 you know, the substance of the -- the substance of 11:18:27
2 the, you know, response. 11:18:32

3 My question is: What people had the 11:18:36
4 documents that were produced to us? 11:18:43

5 A Depending on the document. 11:18:47

6 Q Okay. E-mail communications? 11:18:54

7 A We gave access to the e-mail server. 11:18:56

8 Q And what Geneva personnel had e-mail 11:18:59
9 communications with YesCare or the debtor or 11:19:03
10 Valitas or Corizon? 11:19:09

11 A Very general question. I don't know the 11:19:10
12 answer to that. 11:19:14

13 Q Well, you reviewed the documents, didn't 11:19:15
14 you? 11:19:17

15 A I told you that I reviewed in general. I 11:19:19
16 scanned them and everything was submitted to 11:19:22
17 counsel. 11:19:25

18 Do you have a specific document that 11:19:26
19 you're referring to? 11:19:28

20 Q I'm -- I'm asking about the persons at 11:19:29
21 Geneva who communicated with the debtor, YesCare, 11:19:33
22 or the Corizon entities. 11:19:37

23 You don't -- you don't know -- 11:19:39

24 A I -- I as a corporate director produced 11:19:41
25 all the documents to Geneva's counsel which handed 11:19:44

1	it over to you.	11:19:48
2	Q And you reviewed those documents in	11:19:50
3	preparation for this deposition?	11:19:52
4	A Correct.	11:19:54
5	Q Who at Geneva sent communications to	11:19:54
6	YesCare and Corizon and Valitas in those	11:20:01
7	documents?	11:20:07
8	A Which documents are you referring to?	11:20:08
9	Q The ones you reviewed for this deposition.	11:20:11
10	A You're going to have to specify which	11:20:13
11	document because I don't know which documents	11:20:17
12	you're referring to.	11:20:19
13	We produced hundreds of documents, so	11:20:20
14	which documents are you referring to?	11:20:23
15	Q I'm referring --	11:20:25
16	A How can I -- how can I tell you who	11:20:25
17	produced a document if you're not identifying	11:20:29
18	which document?	11:20:32
19	Q Well, you don't have to tell me that	11:20:33
20	because I didn't ask that.	11:20:35
21	My question is --	11:20:36
22	A So why don't you ask me a question --	11:20:37
23	Q My question is: You reviewed the	11:20:40
24	documents?	11:20:41
25	A Correct.	11:20:42

1 Q The documents you reviewed or in your 11:20:42
2 other knowledge as Geneva's corporate 11:20:46
3 representative, who from Geneva communicated with 11:20:51
4 any of the Corizon entities or YesCare? 11:20:54

5 A I'm going to answer you again. There is 11:21:01
6 various documents. Not every document has 11:21:03
7 communication. 11:21:06

8 Q Sure. 11:21:07

9 A You -- you pulled up an exhibit of a 11:21:07
10 Delaware -- of a Delaware filing. I don't think 11:21:10
11 that a Delaware filing had any communication with 11:21:12
12 anyone, and it's a Geneva document. 11:21:15

13 So which document are you referring to? 11:21:17

14 Q I would be referring to documents that are 11:21:19
15 communication. We agree that that one is not one. 11:21:21

16 A So whatever documents we produced was 11:21:26
17 channeled through me to counsel. 11:21:32

18 Q Okay. Do you know how document 11:21:35
19 productions work in terms of the term custodian? 11:21:42

20 A Yes. 11:21:45

21 Q What does that mean to you? 11:21:45

22 A Custodian means custodian. It's an 11:21:50
23 English word in the dictionary. 11:21:54

24 Q What does it mean to you in the context of 11:21:55
25 Geneva's document production? 11:21:58

1 A Custodian meaning control of the records. 11:22:01

2 Q Okay. 11:22:04

3 A To be able to source the records. 11:22:06

4 Q So in -- when you reviewed Geneva's 11:22:08

5 documents that were produced, did you review the 11:22:18

6 information about the custodian who was the source 11:22:20

7 of the records? 11:22:22

8 A If you go into a file cabinet and you pull 11:22:22

9 out a record from a file cabinet, are you calling 11:22:25

10 the file cabinet a custodian? We sourced -- 11:22:30

11 Q I'm asking what Geneva did -- 11:22:33

12 A -- the records to produce wherever they 11:22:35

13 came from. Like I said, some came from hard 11:22:39

14 copies; some came from digital; some came from the 11:22:43

15 database; some came from e-mails; some came from 11:22:47

16 outside sources. But we produced the documents 11:22:51

17 that Geneva is the custodian in control of. 11:22:53

18 Q Sure. So you understand custodian to be 11:22:56

19 the person in control of the document. Geneva 11:22:59

20 produced documents where the custodian was a woman 11:23:03

21 named Miriam. 11:23:07

22 Who is Miriam? 11:23:09

23 A A custodian? I don't -- I'm not aware of 11:23:12

24 a Miriam custodian. 11:23:15

25 Q So you said that if you take a document 11:23:16

1	from a file cabinet, maybe the file cabinet is the	11:23:18
2	custodian.	11:23:22
3	What if you take a document from	11:23:23
4	somebody's e-mail, who is the custodian?	11:23:25
5	A The company owns the server and we gave	11:23:27
6	searches and keywords. They downloaded all the	11:23:32
7	e-mails.	11:23:35
8	Q So you're not aware that Geneva produced	11:23:35
9	documents with Miriam as the custodian?	11:23:39
10	A Miriam as a custodian, I don't know a	11:23:43
11	custodian by the name Miriam.	11:23:46
12	Q Is there anybody named Miriam who's done	11:23:48
13	work for Geneva?	11:23:52
14	A Yes.	11:23:53
15	Q What's Miriam's last name?	11:23:55
16	A I don't recall.	11:23:56
17	Q What work did she do for them?	11:23:58
18	A Just clerical work.	11:24:02
19	Q Was she a Geneva employee?	11:24:04
20	A No.	11:24:08
21	Q Who was she employed by?	11:24:11
22	A I don't know who she's employed by. But I	11:24:13
23	interacted with her in Geneva, but I don't know	11:24:18
24	the -- I don't know the employees of Geneva. I'm	11:24:19
25	not in HR.	11:24:21

1	Q Okay. In fact, you don't know whether	11:24:23
2	Geneva has employees, correct?	11:24:25
3	A I didn't say that. You asked that	11:24:27
4	specifically.	11:24:31
5	Q The --	11:24:31
6	A You asked me specifics of it and I said	11:24:32
7	I'm not in HR and I'm not involved in the	11:24:35
8	employees of Geneva. I'm a director of the	11:24:38
9	company. I'm a director of many companies and I	11:24:40
10	don't know who the employees are.	11:24:43
11	Q Does Geneva have employees?	11:24:44
12	A Yes. And you're asking me -- and you	11:24:46
13	asked me before how many and how do I know, and I	11:24:50
14	said I believe.	11:24:54
15	Q Okay.	11:24:55
16	A And you asked me what do you mean but --	11:24:55
17	and you asked me, what do you mean believe. I	11:24:57
18	said I believe that they have employees because I	11:24:59
19	interact with them.	11:25:01
20	Q I --	11:25:02
21	A And I even said, I don't know if they're	11:25:03
22	an employee or an independent contractor or	11:25:05
23	they're a 1099, if they're part-time or full-time	11:25:08
24	or a W2. I responded to all those questions.	11:25:09
25	Q Yeah. I think we may just be differing on	11:25:13

1 the definition of not knowing something. So 11:25:18

2 that's fine, we'll move on. 11:25:19

3 A Okay. 11:25:21

4 Q So all right. You're not -- you're not 11:25:21

5 aware that Geneva produced documents with Jay 11:25:25

6 Leitner as the custodian? 11:25:28

7 A I don't know who my counsel identified as 11:25:33

8 custodian when they handed over the documents. 11:25:39

9 All documents -- 11:25:42

10 Q Okay. Let's -- 11:25:42

11 A You're not going to let me finish? 11:25:43

12 Q Go ahead. 11:25:48

13 A All documents that went to counsel, I 11:25:48

14 reviewed them. I reviewed them for being the 11:25:51

15 right documents in response to the question. 11:25:54

16 As far as custodian, Geneva is the 11:25:58

17 custodian. Exactly where each document came from, 11:26:01

18 from which sources, you will have to pull the 11:26:04

19 document up and maybe I'll be able to identify 11:26:09

20 where we got it from. 11:26:11

21 Q Did you get any documents from Jay Leitner 11:26:13

22 that you produced to us? 11:26:22

23 A We gave access to the server. I don't 11:26:25

24 know where in the server, which document was 11:26:32

25 pulled from where. 11:26:34

Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

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1	Q Do you know whether anybody was asked for	11:26:36
2	documents other than you?	11:26:42
3	A I don't know.	11:26:45
4	Q Okay. Hold on one second. All right.	11:26:48
5	Let's take -- sorry, about that -- we've got a	11:27:14
6	little -- I'm disorganized on my documents here.	11:27:14
7	MR. HEMENWAY: We'll take a short break,	11:27:17
8	just five minutes.	11:27:17
9	THE VIDEOGRAPHER: Time is 11:27 a.m.	11:27:20
10	We're off the record.	11:27:26
11	(Whereupon a break was had.)	11:27:27
12	THE VIDEOGRAPHER: The time is 11:32 a.m.	11:33:01
13	We're back on the record.	11:33:07
14	BY MR. HEMENWAY:	11:33:07
15	Q All right. Let's go ahead and pull up our	11:33:08
16	next exhibit, which is the document ending in --	11:33:10
17	it's YC-E-038632.	11:33:17
18	REMOTE TECHNICIAN: Stand by.	11:33:24
19	(Exhibit 9 marked for identification.)	11:33:27
20	REMOTE TECHNICIAN: Just give me one	11:33:37
21	second to download this. It's a slightly larger	11:33:38
22	file.	11:33:42
23	MR. HEMENWAY: No problem. So go ahead	11:33:42
24	and zoom in and --	11:34:02
25	BY MR. HEMENWAY:	11:34:06

1	Q Mr. Lefkowitz, I think you had liked to	11:34:06
2	scroll down to the bottom for the last ones. I'm	11:34:11
3	happy to do that here.	11:34:14
4	A Okay.	11:34:24
5	Q So there's Geneva and there's YesCare	11:34:25
6	entities down below.	11:34:34
7	A Okay.	11:34:38
8	Q Okay. Are you familiar with this	11:34:38
9	agreement?	11:34:40
10	A Looks like one of the purchase documents.	11:34:43
11	Q And it's a stock restriction agreement.	11:34:51
12	A Okay.	11:34:54
13	Q Do you know what requirements it imposes?	11:34:55
14	A 91-page document.	11:35:03
15	Q I am just asking if you know what a stock	11:35:06
16	restriction agreement is.	11:35:09
17	A I know what a stock restriction agreement	11:35:10
18	is.	11:35:12
19	Q Does a stock restriction agreement impose	11:35:12
20	requirements before equity can be transferred?	11:35:17
21	A I don't know about equity, but the	11:35:24
22	agreement calls -- what it calls for, it's a stock	11:35:26
23	restriction agreement.	11:35:29
24	Q Okay. And this agreement prevents YesCare	11:35:30
25	from transferring its stock without Geneva's	11:35:36

1 approval; is that correct? 11:35:43

2 A I haven't read the agreement right now. 11:35:48

3 You're handing me a 91-page agreement. 11:35:51

4 You want me to read the agreement and to 11:35:53

5 interpret the agreement? 11:35:56

6 Q I'm asking if you know what the 11:35:57

7 agreement -- what the agreement does. 11:35:59

8 A I know the title, Stock Restriction 11:36:01

9 Agreement. It restricts stock. But the terms of 11:36:03

10 it is content of a 91-page document. 11:36:08

11 Q Well, okay. That's fine. You mentioned 11:36:12

12 it was part of the divisional merger? 11:36:19

13 A I believe so. I don't think I'm a 11:36:22

14 signatory to this agreement, am I? 11:36:25

15 Q Understood. We don't need to get into 11:36:28

16 that part. 11:36:32

17 Do you know why Geneva Consulting entered 11:36:34

18 into this agreement? 11:36:42

19 A No. 11:36:43

20 Q You don't know the purpose of the 11:36:43

21 agreement? 11:36:44

22 A Know the purpose, but I don't know why. 11:36:45

23 Q What's the purpose? 11:36:49

24 A Stock restriction agreement. 11:36:50

25 Q To restrict stock from what? 11:36:52

1 A I know what a stock restriction agreement 11:36:54
2 is, but I don't know why -- 11:36:58
3 Q What does a stock -- 11:37:00
4 A All of the -- 11:37:00
5 Q -- restriction do? 11:37:00
6 A What? 11:37:03
7 Q You said you know what a stock restriction 11:37:04
8 agreement is. 11:37:07
9 So what -- what does a stock restriction 11:37:07
10 agreement do? What's the purpose of a stock 11:37:10
11 restriction agreement in your knowledge? 11:37:12
12 A To limit the ability of transferring 11:37:16
13 stock. 11:37:17
14 Q And so this is an agreement that limits 11:37:19
15 the ability of transferring stock. And it's by 11:37:22
16 and between Geneva Consulting, the YesCare 11:37:26
17 entities, and Sarah Tirschwell? 11:37:31
18 A And Corizon New Mexico. 11:37:36
19 Q Yes. So do you know why Geneva was party 11:37:39
20 to an agreement limiting the transfer of stock -- 11:37:44
21 A No. 11:37:48
22 Q -- in -- did Geneva have any ownership 11:37:48
23 interest in YesCare? 11:37:54
24 A Not that I'm aware of. 11:37:55
25 Q Did Geneva provide anything in exchange 11:37:56

1 for receiving this right? 11:38:00

2 A Not familiar with this agreement. 11:38:03

3 Q So you don't know? 11:38:06

4 A This is an agreement between Tirschwell 11:38:08

5 and Schapiro, and I wasn't involved in this 11:38:11

6 agreement. 11:38:16

7 Q And do you know if Geneva was party to any 11:38:19

8 other stock restriction agreements? 11:38:23

9 A I'm not aware of it. 11:38:28

10 Q Okay. And do you know who negotiated this 11:38:32

11 agreement for Geneva? 11:38:41

12 A No. 11:38:42

13 Q And do you know who negotiated this 11:38:42

14 agreement for YesCare? 11:38:50

15 A No. 11:38:51

16 Q Okay. 11:38:51

17 MR. HEMENWAY: Okay. That's all I have on 11:38:55

18 YesCare, so we can just move right into -- or 11:38:59

19 excuse me, not YesCare, Geneva. 11:39:01

20 So we can move into PharmaCorr unless 11:39:03

21 anybody needs a break. 11:39:06

22 MR. DAVIDSON: I don't need a break, Zach, 11:39:09

23 but I'm going to sign off and let you guys 11:39:11

24 continue without me. 11:39:14

25 MR. HEMENWAY: You bet. 11:39:15

Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

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1	MR. DAVIDSON: Thanks. So this depo is	11:39:16
2	concluded?	11:39:16
3	MR. HEMENWAY: Agreed.	11:39:22
4	MR. DAVIDSON: So we're done?	11:39:22
5	MR. HEMENWAY: Agreed. Geneva Consulting	11:39:23
6	2004 is concluded.	11:39:25
7	MR. DAVIDSON: Thanks.	
8	THE REPORTER: Am I needing to start a new	
9	transcript for this part?	
10	MS. HAYWARD: Yes. And while we -- if we	
11	could take a five-minute comfort break.	
12	MR. HEMENWAY: Just to -- for the benefit	
13	of the Planet Depos people who are one, we're	
14	doing three depositions today, three different	11:39:46
15	2004 corporate representative exams.	11:39:46
16	But my understanding, and you know,	11:39:48
17	Melissa, don't feel any need to jump in and	11:39:50
18	correct. I'm just doing this for Planet Depos,	11:39:50
19	so...	11:39:50
20	So but my understanding is Mr. Lefkowitz	11:39:53
21	will be the witness for all three of them. So it	11:39:56
22	will be the same lawyers, same witness, but we're	11:39:58
23	going to have two other transcripts, two other	11:40:01
24	2004 exams.	11:40:03
25	THE REPORTER: Then we'll -- we'll need to	11:40:08

Transcript of Isaac Lefkowitz, Corporate Designee (GENEVA)

Conducted on August 14, 2023

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1 go off the record. 11:40:09

2 THE VIDEOGRAPHER: The time is 11:40 a.m. 11:40:10

3 We're off the record. 11:40:12

4 (Whereupon the proceedings were concluded at 11:40:14

5 11:40 a.m. CST)

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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC

2 I, Karisa Ekenseair, the officer before
3 whom the foregoing deposition was taken, do hereby
4 certify that the foregoing transcript is a true
5 and correct record of the testimony given; that
6 said testimony was taken by me stenographically
7 and thereafter reduced to typewriting under my
8 direction; that reading and signing was not
9 requested; and that I am neither counsel for,
10 related to, nor employed by any of the parties to
11 this case and have no interest, financial or
12 otherwise, in its outcome.

13 IN WITNESS WHEREOF, I have hereunto set my
14 hand and affixed my seal this 21st day of August,
15 2023.

16 

17
18 Karisa Ekenseair, CCR, RMR LS #5753
19
20
21
22
23
24
25

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